



DISTRIBUTION STATEMENT A
Approved for public release
Distribution Unlimited

DEPARTMENT OF THE AIR FORCE
AIR UNIVERSITY
AIR FORCE INSTITUTE OF TECHNOLOGY

Wright-Patterson Air Force Base, Ohio

AFIT/GEEM/EN/95D-07

A CASE STUDY OF THE ENVIRONMENTAL IMPACTS
OF THE BEDDOWN OF THE C-17 GLOBEMASTER III
AT CHARLESTON AFB

THESIS

Richard H. Houghton Jr., Captain, USAF

AFIT/GEEM/EN/95D-07

19960130 053

Approved for public release; distribution unlimited



The views expressed in this thesis are those of the author and do not reflect the official policy or position of the Department of Defense or the United States Government

A CASE STUDY OF THE ENVIRONMENTAL IMPACTS
OF THE BEDDOWN OF THE C-17 GLOBEMASTER III
AT CHARLESTON AFB

THESIS

Presented to the Faculty of the School of Engineering
Air Education and Training Command
In Partial Fulfillment of the
Requirements for the Degree of
Master of Science in
Engineering and Environmental Management

Richard H. Houghton Jr., B.E.

Captain, USAF

December, 1995

Approved for public release; distribution unlimited

AFIT/GEEM/EN/95D-07

A CASE STUDY OF THE ENVIRONMENTAL IMPACTS
OF THE BEDDOWN OF THE C-17 GLOBEMASTER III
AT CHARLESTON AFB

THESIS

Richard H. Houghton Jr., B.E.

Captain, USAF

December, 1995

Presented to the Faculty of the School of Engineering

of the Air Force Institute of Technology

In Partial Fulfillment of the

Requirements for the Degree of

Master of Science in Engineering and Environmental Management

Maj Edward C. Heyse, PhD

Lt Col Steven T. Lofgren, PhD

Lt Col Karen W. Currie, PhD, CPL
Advisor

Acknowledgments

A host of people helped me complete this thesis. The originator of the research idea was Lt Col Roy Salomon, who spent many hours helping me shape the approach. My advisor, Lt Col Karen Currie, took charge of the ship when Lt Col Salomon was assigned to the Air Staff. She helped me organize the approach to a tricky problem, where few have strayed before. Lt Col Steve Lofgren and Maj Ed Heyse helped keep me on track when the enormity of the acquisition process altered my focus. Thanks to Prof Dan Reynolds, who answered some off-the-wall questions and always flowed with enthusiasm. Dean Campbell somehow got my computer back on line more than a few times, when I thought all was lost. These are the unsung heroes for me and my classmates.

The folks at Charleston AFB were extremely helpful, as well as excellent hosts. Glenn Easterby, Sandie Beneway and Marvin Skipper provided great support. Dale Cook was a wealth of knowledge in the logistics group. Special thanks to Lt Ben Hager for helping me research the cultural and socioeconomic aspects of Charleston County.

Back at Wright-Patt, Capt Mike Nelson was extremely helpful in helping me hunt down the acquisition environmental information I needed. He miraculously organized and tabbed a large volume of historic documentation during his tenure at the C-17 SPO.

I thank my classmates, who all helped me grow and learn these past 18 months. In the words of Trish Stager “We have so much talent in our class”. Last, and most important, thanks to Cammie, for all the support, and Mom, for all the prayers.

Richard H. Houghton Jr.

TABLE OF CONTENTS

	Page
Acknowledgments.....	ii
List of Figures.....	vi
List of Tables.....	vii
List of Acronyms.....	viii
Abstract.....	x
I. Introduction.....	1
Chapter Overview.....	1
Purpose of the Study.....	1
Background.....	1
Justification for the Research.....	3
Problem Statement.....	3
Research Objective.....	3
Research Questions.....	4
Scope and Limitations.....	5
Research Approach.....	5
Outline.....	6
Summary.....	6
II. Literature Review.....	7
Chapter Overview.....	7
The National Environmental Policy Act.....	7
The Environmental Impact Analysis Process.....	9
Pollution Prevention in the NEPA.....	10
Defining Pollution Prevention.....	10
Pollution Prevention as an Environmental Planning Tool.....	12
Green Design.....	16
Weapon System Acquisition.....	17
The DoD Acquisition Process.....	17
The C-17 Acquisition.....	19
Significance of Environmental Planning in Acquisition.....	21
Summary.....	22

III. Methodology.....	23
Chapter Overview	23
Research Questions.....	23
Data Collection Methodology.....	24
Documentation Evidence.....	24
Interviews.....	25
Representativeness of the C-17 Acquisition Program.....	26
Answering the Research Questions.....	27
Environmental Postauditing.....	27
Constructing a Framework for Environmental Planning	30
Evaluating the Quality of Environmental Documentation.....	31
Evaluating Impact Identification.....	32
Evaluating Impact Measurement.....	32
Evaluating Impact Interpretation.....	33
Evaluating Impact Communication.....	34
Summary.....	35
IV. Analysis.....	36
Chapter Overview.....	36
Environmental Impacts at Charleston AFB.....	36
Air Quality.....	38
Noise.....	39
Water Quality.....	40
Water Usage.....	40
Solid Waste.....	42
Sewage.....	44
Cultural Resources.....	45
Socioeconomics.....	46
Utilities.....	48
Construction.....	49
Unresolved Issues.....	50
Framework for Environmental Planning in Acquisition.....	51
Who Performed Environmental Planning?.....	51
When Was Environmental Planning Accomplished?.....	53
How Was Environmental Documentation Prepared?.....	55
Evaluation of Environmental Documentation.....	57
Lessons Learned.....	63
Summary.....	64

V. Conclusions and Recommendations.....	65
Chapter Overview.....	65
Research Design.....	65
Conclusions.....	66
Discussion of Results.....	73
Areas for Future Research.....	75
Summary.....	75
Appendix A: Checklist for Document Review.....	76
Appendix B: Interview Data.....	77
Appendix C: Flow Chart of Acquisition Environmental Planning.....	82
Appendix D: C-17 Timeline.....	83
Appendix E: Statistical Analysis Results.....	84
Bibliography.....	87
Vita.....	91

LIST OF FIGURES

Figure		Page
Figure 1	Hazardous Waste Generation Data.	13
Figure 2	The Acquisition Process.....	18
Figure 3	Annual Comparison of Water Usage at CAFB.....	41
Figure 4	Annual Comparison of Sewage at CAFB.....	45

LIST OF TABLES

Table		Page
1.	Matrix of Environmental Categories and Evaluation Areas.....	29
2.	Evaluation Criteria Scoring System.....	34
3.	Environmental Document Evaluation Criteria.....	35
4.	Environmental Impacts of the C-17 at CAFB	37
5.	Summary of Air Quality Impacts.....	39
6.	Summary of Noise Impacts.....	39
7.	Summary of Water Quality Impacts.....	40
8.	Monthly Water Use, Charleston AFB.....	40
9.	Summary of Water Usage Impacts.....	41
10.	Solid Waste Generation.....	42
11.	Hazardous Waste Generation.....	42
12.	Summary of Solid Waste Impacts.....	43
13.	Monthly Wastewater Production.....	44
14.	Summary of Sewage Impacts.....	45
15.	Summary of Cultural Resource Impacts.....	46
16.	Summary of Socioeconomic Impacts.....	48
17.	Monthly Energy Use.....	48
18.	Summary of Utility Impacts.....	49
19.	Summary of Construction Impacts.....	50
20.	Contents of May 1981 Environmental Assessment.....	56
21.	Environmental Document Evaluation.....	57

List of Acronyms

AICUZ	Air Installation Compatible Use Zone
AFAM	Air Force Acquisition Model
AFI	Air Force Instruction
AFMC	Air Force Material Command
AFSC	Air Force Systems Command
AMC	Air Mobility Command
ASC	Aeronautical Systems Center
ASD	Aeronautical Systems Division
CAF B	Charleston Air Force Base
CATEX	Categorical Exclusion
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DoD	Department of Defense
DoDI	Department of Defense Instruction
DoDIG	Department of Defense Inspector General
EA	Environmental Assessment
ECAMP	Environmental Compliance Assessment and Management Program
EIAP	Environmental Impact Analysis Process
EWG	Environmental Working Group
FSD	Full Scale Development

HC	Hydrocarbons
IPS	Integrated Program Summary
LSAR	Logistic Support Analysis Record
MAC	Military Airlift Command
MD	McDonnell Douglas
MDAP	Major Defense Acquisition Program
NEPA	National Environmental Policy Act
NOV	Notice of Violation
ODC	Ozone Depleting Chemicals
OTA	Office of Technology Assessment (U.S. Congress)
P2	Pollution Prevention
PMD	Program Management Directive
PPA	Pollution Prevention Act
PEA	Programmatic Environmental Assessment
RM&AE	Reliability, Maintainability and Availability Evaluation
SCDHEC	South Carolina Department of Health and Environmental Control
USAF	United States Air Force
USEPA	United States Environmental Protection Agency

Abstract

United States Air Force acquisition environmental planning has changed significantly since the passage of the National Environmental Policy Act in 1969. This research examined the role of environmental planning in weapon system acquisition. It focused on environmental planning performed for the C-17 Globemaster III prior to its beddown at Charleston Air Force Base. The case study of the C-17 beddown included interviews, archival record reviews, and direct observations at the base. Evidence was collected to determine what environmental impacts occurred during the beddown. An environmental postaudit compared actual impacts with those predicted in environmental planning documentation. Impacts were analyzed to determine if they resulted from local conditions or requirements. A framework of the acquisition process was constructed and environmental requirements were flowcharted. A timeline of C-17 events was developed for comparison of C-17 history with an ideal acquisition process. Finally, environmental planning documentation was evaluated using 20 objective criteria to determine its quality. Two minor impacts were identified at Charleston AFB during data collection in June 1995 - two years after the first C-17 arrived there. Impacts did not result from unique local conditions. Recommendations were presented regarding the quality and timing of weapon system environmental planning.

A CASE STUDY OF THE ENVIRONMENTAL IMPACTS
OF THE BEDDOWN OF THE C-17 GLOBEMASTER III
AT CHARLESTON AFB

I. Introduction

Chapter Overview

This chapter describes the problem addressed by this thesis, outlines the scope of research, and summarizes the methodology used to explore the role of environmental planning in weapon system acquisition.

Purpose of the Study

This study explores the role of environmental planning in weapon system acquisition. It describes historic and current environmental planning guidance used by the United States Air Force (USAF) in the acquisition process. Within this framework, a case study is used to analyze the environmental planning conducted in the acquisition of the C-17 Globemaster III aircraft. Actual environmental impacts caused by the C-17 beddown at Charleston Air Force Base (CAF) are compared to those predicted in environmental analysis documentation. Results of the study provide feedback to the acquisition community regarding lessons learned from past weapon system environmental planning.

Background

The National Environmental Policy Act (NEPA) of 1970 mandates environmental planning for all major federal actions such as the acquisition of a new weapon system (Lillie and Lindenhofen, 1991:31). Since the NEPA was passed, dozens of laws and environmental regulations, encompassing thousands of pages, have been published. The

Department of Defense (DoD) responded to these regulations with an array of environmental programs. In the Air Force, these programs are most often managed at installation environmental management offices. Much of the effort in these offices is focused on complying with today's regulations while cleaning up yesterday's contaminated sites. Key planning for tomorrow's environmental changes occurs in the acquisition community, where new weapon systems are designed and developed. Decisions made during acquisition can have long term environmental impacts because the acquisition process represents an early phase in the life cycle of Air Force weapon systems. Quality environmental planning during weapon system development can result in reduced environmental impact at later stages in the life cycle.

One way to gain insight into the quality of Air Force environmental planning is to analyze NEPA documentation for a major federal action. This can be done using an environmental postaudit. A postaudit is a tool that analyzes NEPA planning by comparing actual and predicted impacts of projects subjected to environmental analysis required by the NEPA. Environmental professionals, including the President's Council on Environmental Quality (CEQ), are calling for increased use of environmental postaudits (Culhane, 1993: 66). This thesis features a postaudit of the environmental analysis for the acquisition and beddown of the recently fielded C-17 cargo aircraft.

The McDonnell-Douglas C-17 Globemaster III is a weapon system that the U.S. Air Force developed in the 1980s and fielded in the 1990s. The first squadron of C-17s is currently being bedded down at Charleston AFB, South Carolina. The initial Globemaster III deployed to Charleston in 1993. C-17s will continue to be added to the Charleston fleet through 1998. Much of the environmental planning for the aircraft beddown occurred in 1989, when the environmental assessment was published by Headquarters Military Airlift Command (Department of the Air Force, 1989: 1). This document was reviewed as part of this research.

Justification for the Research

Environmental postaudits are rare (Culhane, 1993: 67). They contribute to the state of the art of environmental analysis by providing feedback from previous experience. The postaudit performed as part of this research is a contribution to the growing database of environmental information which is a valuable tool for acquisition environmental planners. Further, as recently as December, 1993, the DoD found that environmental issues are not efficiently considered in the acquisition process (Noble, 1994:30). This case study provides information that illuminates environmental issues in the acquisition process.

Problem Statement

Installations have site-specific environmental requirements that must be identified and addressed early in weapon system development. Study of the beddown of a recently deployed weapon system can yield insight into the success of our acquisition environmental planning and the extent to which local environmental requirements should be considered in the acquisition process.

Research Objective

The objective of this research was to use the C-17 beddown as a case study to determine the effectiveness of environmental planning in weapon system acquisition, and to suggest procedures to improve environmental planning in the development and beddown of future weapon systems. DoD leaders need criteria for measuring success in environmental programs. Such criteria are defined by various sources in the literature, and can be used to judge the quality of major defense acquisition environmental programs. While many models exist to assess actual impacts and outcomes of major federal decisions, "these models have been adopted only sporadically by U.S. federal

agencies" (Culhane, 1993: 66). This research focuses on one major federal action that included NEPA planning. It compares actual and predicted environmental impacts. Results of the comparison provide valuable lessons that can be applied to future environmental planning activities.

This thesis explores the relationship between environmental planning and the acquisition process in detail. The concept of pollution prevention is described, with particular attention to its role in the acquisition process. The analysis of the C-17 beddown determines how much environmental planning was incorporated in aircraft acquisition, and to what extent environmental analysis predictions matched the actual experience at the beddown location. Measures of merit are developed and employed to characterize the acquisition environmental planning for this weapon system. Special attention is paid to the question of whether local environmental concerns at the beddown location require additional planning early in the acquisition process.

Research Questions

Four research questions were developed as part of this research. These four questions guided research efforts and provide the focus for analysis of information collected. The research questions are listed below:

1. What environmental problems occurred during the beddown of the C-17 at Charleston Air Force Base (CAF^B)?
2. Which, if any, CAF^B environmental problems resulted from unique local environmental requirements or conditions?
3. How were CAF^B environmental issues addressed during the C-17 acquisition process?
4. What lessons learned from the C-17 beddown at CAF^B can be applied to other weapon system beddowns?

Scope and Limitations

This research focused on one weapon system, bedded down at one operational base. Although the lessons learned are instructive, they represent a small sample from the universe of Air Force weapon systems. Another possible limitation is that field observations at Charleston AFB were made before the researcher collected information at the Wright-Patterson AFB acquisition offices. This approach has benefits as well as drawbacks. One benefit is that the field observations were made objectively, with only the research questions as a guideline. One drawback is that without the acquisition framework, some data was not identified for collection until late in the analysis process. A further limitation was that portions of the environmental assessment documents for Charleston AFB remain classified. Despite the existence of classified material, enough material is unclassified to make the analysis feasible. Overall, the information presented in this thesis contributes to the advancement of knowledge in the field of acquisition environmental analysis, while leaving a large amount of follow-on work available for future research.

Research Approach

A case study was designed and performed. The study was structured to collect environmental information about CAFB and analyze it with regard to the relationship between acquisition and environmental planning. Information was collected across environmental media and from multiple installation organizations. Four research questions were answered through a case study structure that included interviews with base personnel, document reviews and site observations.

The methodology used to answer the research questions included the following:

- a. Evidence collection,
- b. Construction of a framework for environmental planning in acquisition, and
- c. An environmental postaudit of C-17 planning documentation.

This three-step process allowed the researcher to observe the impacts of the C-17 at Charleston Air Force base, then to evaluate the planning process and compare environmental impacts with those predicted by the CAFB environmental assessment.

Outline

Chapter 2, Literature Review, presents and summarizes the literature in the areas of acquisition and environmental planning. It presents background information about the acquisition process and the C-17 in particular. It highlights the need for better environmental planning in weapon system acquisition.

Chapter 3, Methodology, details the research approach and the methods used to collect and analyze evidence in order to answer the research questions.

Chapter 4, Analysis, presents the results of the research.

Chapter 5, Summary, presents conclusions reached from the analysis and lessons learned for future weapon system development.

Summary

This chapter presented a research problem and outlined the approach used to explore the role of environmental planning in weapon system acquisition. Case study procedures were presented. The beddown of the C-17 Globemaster III at Charleston AFB was introduced as the subject of the case study.

II. Literature Review

Chapter Overview

This chapter provides background information about the salient issues related to this research. It highlights development of both the environmental planning arena and the acquisition process. Relevant environmental legislation is briefly summarized. Key requirements of the National Environmental Policy Act (NEPA) are presented as they relate to weapon system acquisition. The role of pollution prevention in environmental planning is then discussed in detail. Attention is then directed to the DoD weapon system acquisition process, and the exercise of this process in the procurement of the C-17. Finally, the relationship between environmental planning and acquisition is discussed and illustrated in the case of the C-17.

The National Environmental Policy Act

In late December 1969, Congress passed the National Environmental Policy Act (NEPA). This act, signed as Public Law 91-190 by President Nixon on January 1, 1970, ushered in the "...decade of environmental concern" (Jain, 1993: 43). The purposes of the NEPA were stated in the first paragraph of the law. They were to encourage harmony between man and his environment, prevent damage to the environment, enrich understanding of ecological processes and establish a council of environmental quality.

As applied to Federal actions, the act represents a requirement to consider environmental consequences before making a major decision. "NEPA has become an

‘action-forcing’ mechanism, insuring that Federal decision-makers consider environmental aspects of various projects and proposals” (Graham, 1976: 8). Procedures for considering these environmental aspects are described in Air Force Instruction (AFI) 32-7061, “Environmental Impact Analysis Process”. The instruction discusses the steps that are required to comply with the NEPA, including a chapter on preparing and processing environmental documents.

Examples of Federal actions that require environmental analysis range from constructing a new building to developing a new weapon system. Some actions that are analyzed do not require excessive documentation, while others generate voluminous environmental impact statements. Environmental analysis documents fall into three categories. First, a Categorical Exclusion (CATEX) describes analysis of minor, repetitive actions. Second, an Environmental Assessment (EA) is used to analyze actions that are suspected to have major impacts. Finally, an Environmental Impact Statement is used to analyze actions that definitely have major impacts.

Thousands of Environmental Impact Analyses have been published since the passage of the NEPA. This documentation is designed to improve decision making with regard to environmental impacts. In the opinion of many experts, the requirement was long overdue for Federal agencies to consider environmental issues in their decisions. “For too long agency leadership had focused on economic and technical feasibility of a program or project but had ignored the environmental consequences of their actions. NEPA added the necessary third dimension” (Clark, 1993: 4).

The Environmental Impact Analysis Process

Environmental Impact Analysis involves four major steps: (1) identifying the activity, (2) identifying environmental attributes to measure, (3) measuring the impact of the activity on the attributes, and (4) reporting results (Jain, 1993: 83). Historically, many approaches have been used to report results, some with more success than others. Once the requirement existed to produce the documents, an exciting evolution of environmental analysis techniques occurred. As observed by the senior policy analyst in the office of General Counsel in the President's Council on Environmental Quality, this evolution included some growing pains:

Certainly, many environmental impact statements are too long, take too long to prepare, cost too much, and many times do little to protect the environment. Some EISs are prepared to justify decisions already made, many agencies fail to monitor during and after the project, some agencies do not provide adequate public involvement, and few agencies assess the cumulative effects of an action. (Clark, 1993:4)

In any case, the process of considering environmental impacts is well understood by Federal agencies:

NEPA was designed to change the ethic of federal agencies by fostering an integration of environmental considerations into the decision making process. To a great extent, this has happened. Certainly the agencies that produce the bulk of the EISs (the Forest Service, the Federal Highway Administration, the Bureau of Land Management, the Department of Defense and the Department of the Interior's Minerals Management Service) have well-established environmental components integrated throughout their planning and decision making processes. (Dickerson, 1993: 8)

In the Department of Defense, and the Air Force in particular, environmental analysis has become a key function in managing the planning for future programs.

Pollution Prevention in the NEPA

While environmental analysis focuses on predicting future impacts, the use of Pollution Prevention (P2) actively attempts to prevent them. The P2 approach, defined in this section, is revolutionary compared to traditional practices of producing waste and treating it at the end of output pipelines. Many of today's environmental management advances are in the P2 arena. Yet even though the President's Council on Environmental Quality (CEQ) noted substantial improvements in environmental quality in the 20 years after the passage of the NEPA, the progress was limited to the area of waste cleanup. CEQ leadership noted that "... the challenge of the future is to prevent pollution in the first place. The CEQ believes that the NEPA foresaw that need, and the mandate to assess pollution prevention opportunities exists in Section 101 of the statute" (Clark, 1993: 5). Although twenty years elapsed before a specific pollution prevention law was passed, the origins of that law appear in the NEPA. Today, pollution prevention efforts are an integral part of the NEPA process.

Defining Pollution Prevention

Despite its close relationship with the NEPA process, very little progress was made in the pollution prevention arena in the 1970s or 1980s. Eventually, as toxic chemicals accumulated in our environment, industry leaders acknowledged the need to change their approach to waste management. In the past two decades, environmental managers and scholars have coined several terms for what we now call pollution prevention. The list below contains terms that have been used to describe the P2 process (Freeman, 1995). This list is not exhaustive, but it gives some insight into the concepts embodied in the term pollution prevention:

Avoidance strategy
Humane Chemistry
Nonwaste technology
Pollution control technology
Recycling
Source reduction
Waste Avoidance
Waste minimization

Regardless of the words used to describe the process, the act of reducing waste and protecting the environment should be the focus of any pollution prevention program.

In early 1990, industry publicly embraced the term pollution prevention. Since then the definition of pollution prevention has been widely debated. It was actually introduced in the 1984 Hazardous and Solid Waste Amendments to the Resource Conservation and Recovery Act. Then, in its 1986 Report to Congress, EPA stated that waste minimization is:

The reduction to the extent feasible, of hazardous waste that is generated or subsequently treated, stored or disposed of. It includes any source reduction or recycling activity undertaken by a generator that results in either (1) the reduction of total volume or quantity of hazardous waste, or (2) the reduction of toxicity of hazardous waste, or both, so long as reduction is consistent with the goal of minimizing present and future threats to human health and the environment.
(Comella and Rittmeyer, 1990: 71)

The EPA set a hierarchy of waste management that defines four broad categories including: (1) source reduction, (2) recycling, (3) treatment and, the least preferred method, (4) disposal. Price notes that when one looks at the range of options in the waste management hierarchy, the first preference is source reduction. In practice however, most manufacturers need to use the entire hierarchy to minimize the potential effects of their operations on the environment (Price, 1993: 93).

The EPA refined the definition of pollution prevention again in 1992. This time it stated,

Pollution Prevention means ‘source reduction’, as defined under the Pollution Prevention Act, and other practices that reduce or eliminate the creation of pollutants ... Under the Pollution Prevention Act, recycling, energy recovery, treatment, and disposal are not included within the definition of pollution prevention. (Habicht, 1992)

If waste reduction is the goal, how do we measure our success at achieving the goal?

Bush notes that although measurement is necessary to monitor the progress of a given pollution prevention strategy, it is not a straightforward task (Bush, 1992: 432). She further states that the complex task of measuring pollution prevention requires much thought about industry and site specific conditions. In this developing field, there is no ‘one-size-fits-all’ approach.

The need to assess progress in pollution prevention is clear. Yet, with such a wide array of organizations and stakeholders involved, no single measure of pollution prevention will suit everybody’s needs. Indeed, there are often as many measurements of P2 success as there are interested parties. Freeman concisely describes the situation:

As a relatively new field, measuring pollution prevention has not developed to the point where there are accepted techniques, indicators, or even definitions for making consistent and comparable estimates. Many of the data sources currently used in measuring pollution prevention were not designed for this purpose and it is unclear whether they adequately do the job. Also, the data available for measuring progress differs greatly from organization to organization.
(Freeman, 1995:237)

Pollution Prevention as an Environmental Planning Tool

Pollution prevention is a relatively new approach to waste management, replacing the traditional idea of treating the waste we inevitably produce. When Congress passed the Pollution Prevention Act in 1990, decades of hard learned waste management lessons were transformed into law requiring this fresh approach to environmental protection. Nearly five years later, pollution prevention policies are producing results. To illustrate

At this point, data collected by headquarters United States Air Force (USAF) show the progress of pollution prevention efforts. In the USAF alone, the amount of hazardous waste disposal was cut by over 60 percent between 1987 and 1994. However, as shown in Figure 1, there are still nearly 20,000 tons of hazardous waste being generated by the USAF each year (Murphy, 1995).

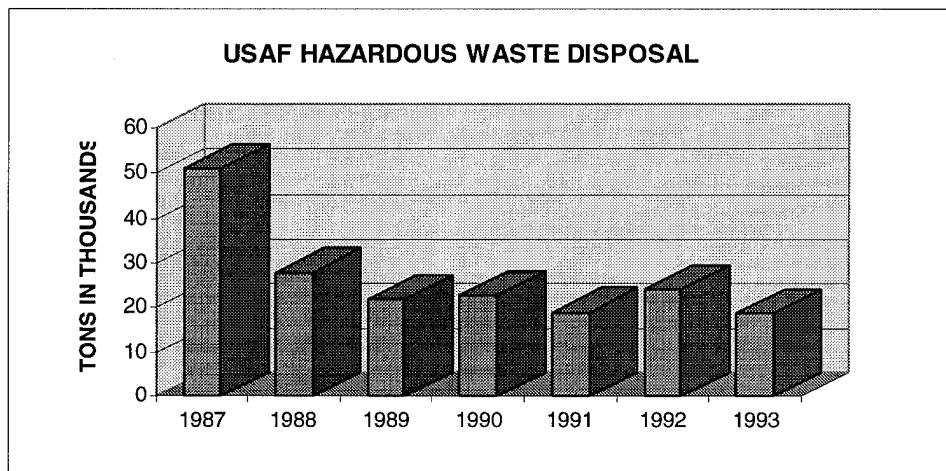


Figure 1: Hazardous Waste Generation Data

This amount of waste still represents tremendous opportunity for further pollution prevention efforts.

One potential area for pollution prevention is in the design and development of new weapons systems. While there are always pollution prevention concepts that can be adopted during the operational life of a weapon system, the best ideas come early in the process. This is when the greatest potential for pollution prevention exists. Aeronautical Systems Center (ASC) notes, "The opportunities for incorporation of pollution prevention strategies diminish as acquisition phases are completed" (ASC, 1994: 2-2). Because the acquisition arena is fertile ground for pollution prevention, the USAF can reap benefits by reviewing recent aircraft development programs and determining to what

extent pollution prevention opportunities were exploited. Lessons learned from recent weapon system acquisitions can provide Air Force leaders with helpful feedback regarding pollution prevention in the USAF.

In a 1989 memorandum for secretaries of the military departments, Secretary of Defense Dick Cheney charged the DoD to be the Federal leader in agency environmental compliance and protection (Cheney, 1989). As a result of the 1990 Pollution Prevention Act and the 1992 Federal Facilities Compliance Act, DoD is additionally challenged to lead the change to a pollution prevention culture. A benefit of this change is resultant improvement in environmental compliance because less pollution translates to better compliance. Alternatively, unfocused, ineffective pollution prevention initiatives may result in increased incidences of noncompliance. Compliance records can be used as an indicator of pollution prevention opportunities. Improvement areas can be identified through an in-depth investigation of the environmental compliance impacts of newly bedded down weapon systems at USAF installations. For example, a sudden increase in hazardous waste management violation notices at a base that is bedding down a new weapon system may be a signal that P2 was not optimally employed.

The concept of pollution prevention would not be particularly new or interesting in the 1990s if not for the unique combination of environmental events and legislation in the 1980s, which culminated with the Pollution Prevention Act (PPA) of 1990. Historically, the United States Environmental Protection Agency (USEPA) has enforced waste control regulations with violation notices and fines. It took the catalyst of financial demotivation to alert industry to the value of pollution prevention. The key point was that investments

to minimize waste were only wise if they were profitable. In other words, pollution prevention was cost effective when it became expensive to pollute. When the PPA was passed, American manufacturers were spending nearly \$50 million on pollution control measures and equipment, yet their waste disposal bills accounted for an even bigger slice of the corporate budget (Comella and Rittmeyer, 1990: 71). The PPA provided incentive to improve waste minimization processes.

Given that the cost of waste management is high, one might ask why the current pollution prevention revolution has taken so long to occur. The answer may be that until recently, our industry leaders felt no pressure to be responsible stewards of the environment. Interestingly, many industry people claim that pollution prevention has been practiced, under the name of yield improvement, for as long as there has been manufacturing (Price, 1993: 93). Now, however, there is more technology available to pursue a range of pollution prevention opportunities.

The pollution prevention opportunities today represent a very new approach to waste management. Historically, the waste produced by the aerospace industry was viewed as a necessary evil, and simply treated - if at all - at the point where it was released into the environment. This approach to waste management is often referred to as 'end of pipe treatment'. The problem with this approach is that it does nothing to promote responsible waste handling or disposal. In fact, most waste treatment simply transfers hazard from one medium such as land, to another such as water or air.

The Earth has shown considerable ability to handle human discharges. However, the earth's capacity to heal is stressed to the breaking point when the net effect of millions of

pounds of pollutants is taken into account. Prior to the Rio earth summit in 1993, Ramphal proclaimed that the message was clear: “Despite human accomplishments, Earth and all it sustains are endangered” (Ramphal, 1992: 3). It was not a new message, but it had acquired new authority and urgency with the recognition that human survival itself could be at risk. The Pollution Prevention Act is one sign that governmental leaders finally recognized the damage caused by the sum total of our waste.

Green Design

One way that environmental issues enter the acquisition process is up-front “Green Design”. This term captures the idea of incorporating environmental concerns early in the conceptual stage of a product lifecycle. Congress’ Office of Technology Assessment (OTA) defines green design as “a design process in which environmental attributes are treated as design objectives, rather than constraints” (OTA, 1992:7). The concept of green design can be effectively incorporated into early phases of the acquisition process, resulting in a more environmentally friendly weapon system. However, green design alone will not guarantee that there will be no environmental problems once a weapon system is fielded. Comprehensive environmental planning must be performed and the impacts of the weapon system must be considered.

Weapon System Acquisition

Acquisition of weapon systems in the Department of Defense is a complicated undertaking, even before environmental objectives are incorporated into the process. “It is a methodological process, always trading off cost, schedule and performance in order to field the best weapon system to meet the threat” (Przemieniecki, 1993: 35). In theory, it is a relatively easy task to outline the process of providing weapon systems to meet mission needs. However, in practice there are many confounding factors. A logical first step in reviewing the acquisition process is to define its purpose. “The purpose of weapon systems acquisition is to provide the operational user with a capable, supported and affordable weapon system and to deliver the system when and where it is needed” (Schoonover, 1994: 7). The concept of a weapon system includes both the weapon and its logistics support. All weapon systems, from the simplest to the most complex, follow a process that includes phases and milestones described below.

The DoD Acquisition Process

“The acquisition process provides a means of progressively translating broadly stated mission needs into well-defined-system-specific requirements” (Przemieniecki, 1993: 20). This process includes four phases, each preceded by a milestone decision review. Milestone reviews are analogous to gateways between acquisition phases. “At the milestone review, the accomplishments of a program in the previous phase and its readiness to enter the next phase are assessed. The primary document used in this review is the Integrated Program Summary (IPS)” (Schoonover, 1994: 8). An IPS contains

critical environmental impact information. The Acquisition Pollution Prevention AFMC Implementation Guide notes that:

Milestones require extensive documentation detailed in the Integrated Program Summary (IPS). The IPS format is called out in DoD 5000.2-M (Part 4). An environmental analysis is required as Annex E of the IPS. Details concerning preparation of the environmental analysis are contained in DoDI 5000.2, Part 6-1. (Air Force Materiel Command, 1993: A-3)

In addition to environmental issues, the IPS contains information about a wide range of topics including life cycle cost and contracting strategy. Based on this information, the program review board establishes goals for the next acquisition phase. These goals will be review criteria for the following milestone. When criteria are met, the program exits one phase and enters the next. DoD weapon system acquisition phases and milestones are shown in Figure 2 (Air Force Materiel Command, 1993).

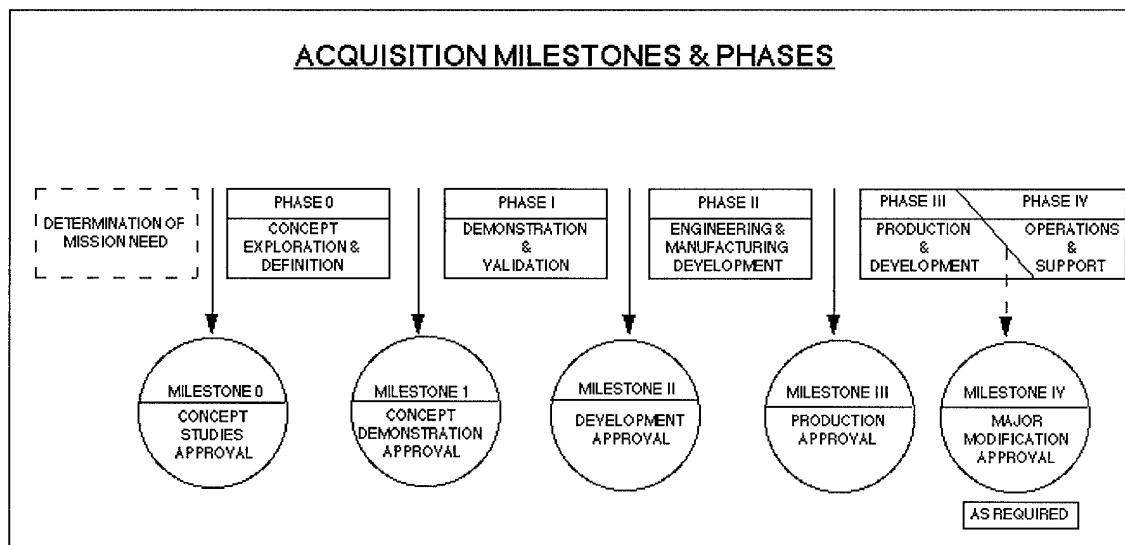


Figure 2: The Acquisition Process

The environmental planning efforts for weapon systems continue to focus on two areas: impacts and pollution prevention (Nelson, 1995). Impacts must be considered in environmental analyses that identify environmental effects in detail. "To comply with applicable environmental protection laws and regulations, an environmental analysis of new defense systems will begin at the earliest possible time" (Przemieniecki, 1993: 330). This analysis is incorporated into a Programmatic Environmental Assessment (PEA) that is an integral part of the IPS described above. Currently, updated environmental analysis are performed and added to the PEA at each milestone.

While pollution prevention is a subset of environmental planning concerns, it provides an powerful tool for reducing impacts. DoD officials know that early environmental planning and P2 efforts can have lasting payoffs:

Decisions made during concept exploration and definition, demonstration and validation, engineering and manufacturing development, and the production phases of the acquisition process directly influence the cost of managing material and waste streams for production contractors, depots, and installations that maintain and operate the systems. They also affect the cost to the Air Force of disposing of the system at the end of its useful life. Decisions made during the acquisition process leave a legacy that lasts long after acquisition is completed. (Przemieniecki, 1993: 325)

The C-17 Acquisition

The C-17 acquisition occurred during a period when environmental regulations were increasing exponentially. Long before the Pollution Prevention Act was passed, engineers at Aeronautical Systems Division (ASD) were performing environmental analysis of the C-X aircraft, which eventually became the C-17. In 1981, ASD staff

environmental planners completed an environmental assessment for the C-X which described the proposed aircraft as follows:

The C-X will be a multi-engine turbofan wide body aircraft capable of airlifting a substantial payload over intercontinental ranges without refueling and will be specifically designed to move outsized combat equipment/cargo into and within an austere airfield/moderate threat environment. The aircraft will be equipped with receiver inflight refueling capability to increase its range/payload capacity. Current direction for the program is provided by Program Management Directive (PMD) #RC 0020(1), dated 22 April 1981. (Department of the Air Force, 1981:1)

At this time, the program was in Phase I, preparing for Milestone II. The passage of Milestone II into Phase II occurred when Full Scale Development (FSD) was approved by the Secretary of Defense in February of 1985 (Miller and Williams, 1993: 151). When McDonnell Douglas Corporation began fabricating the first C-17 in November 1987, the only historical environmental documentation was the C-X assessment. ASD personnel in the C-17 SPO began work on a supplemental programmatic EA in May 1989. The purpose of this document was to update the original C-X environmental assessment. At the same time planners at Military Airlift Command were preparing an environmental assessment for the beddown of the C-17 at Charleston AFB. This document contained much more detail than the programmatic EA. Air Force System Command legal staff would later reject ASD efforts to publish a final draft of the programmatic EA. Meanwhile, the Defense Acquisition Board made the Milestone IIIA low rate initial production decision in January 1989. Due to intense Congressional scrutiny and oversight of the C-17 program, it was not until June 1993 that the first C-17 arrived at Charleston AFB. In the interim, Air Force personnel had the opportunity to work

extensively with McDonnell Douglas to improve the environmental planning for the aircraft.

Significance of Environmental Planning in Acquisition

The relationship between defense acquisition and environmental management has been explored since the passage of the NEPA. As early as 1976, the Defense Systems Management School outlined the impact of environmental regulations on defense system acquisition management. The report concluded that “the impact of environmental regulations is a significant factor that should be considered by defense system programmers as early in the program as possible” (Graham, 1976:ii). Despite this realization, the Department of Defense took little action to rigorously improve acquisition environmental management until the early 1990s.

The acquisition community has a large capacity for either causing or mitigating environmental impacts during the development of new weapon systems. In an audit report issued in December 1993, the Department of Defense Inspector General (DoDIG) addressed the effectiveness of DoD environmental planning in acquisition programs. The DoDIG issued the following three findings:

- a. Environmental oversight was not fully effective.
- b. There was a failure to assess programmatic environmental tradeoffs when conducting Cost and Operational Effectiveness Analyses.
- c. An accurate estimate for environmental clean-up and remediation liabilities of Defense contractors has not been fully developed.

The lesson here is that environmental concerns need to be integrated into the acquisition decision making process (Noble, 1994).

The Air Force needs to know the effectiveness of environmental programs in weapon system acquisition. Currently, the author is aware of no similar research that concentrates on the result of environmental planning for a weapon system. Little guidance exists that discusses what happens after required NEPA documentation is completed. Current practice for weapon system development in the Air Force is to prepare a generic environmental planning document for the program, then conduct specific environmental planning for the beddown location. With a new focus on pollution prevention during design, it may be more appropriate to conduct more in-depth environmental planning up front. As a result of early consideration of environmental impacts, and application of green design, we can reap benefits such as reduced use of hazardous materials and less generation of hazardous waste.

Summary

This chapter reviewed the National Environmental Policy Act, Pollution Prevention, DoD weapon system acquisition, and key acquisition milestones for the C-17. The role of environmental planning in acquisition was explored. The next chapter will consider the evidence that shows whether environmental planning was effective for the C-17 at Charleston AFB.

III. Methodology

Chapter Overview

This chapter outlines the research approach used to collect and analyze information regarding the relationship between environmental planning and the DoD acquisition process. The methodology used to answer the research questions included the following:

- a. evidence collection,
- b. an environmental postaudit of C-17 planning, and
- c. construction of a framework for environmental planning in acquisition.

This approach studies the acquisition of the C-17, highlights environmental issues related to the aircraft, and reviews the timing of planning and decision making.

Research Questions

This research was designed to answer the four questions which were discussed in the introductory chapter. Because these questions drive the methodology, they are repeated below:

1. What environmental problems occurred during the beddown of the C-17 at Charleston Air Force Base (CAFB)?
2. Which, if any, CAFB environmental problems resulted from unique local environmental requirements or conditions?
3. How were CAFB environmental issues addressed during the C-17 acquisition process?
4. What lessons learned from the C-17 beddown at CAFB can be applied to other weapon system bedowns?

These questions provided the focus for evidence collection at Charleston AFB and follow-up background research in the acquisition community at Aeronautical Systems Command (ASC) at Wright Patterson AFB. Information was collected during June 1995 with follow-up in August and September 1995. The process for evidence collection is discussed in detail below.

Data Collection Methodology

A large portion of the information collected during this research effort occurred at Charleston AFB during an intensive week of evidence collection from 22-30 June 95. Three sources of evidence, described by Yin (1989:85) were the focus of data collection for this case study. These included documentation, interviews and direct observations.

Documentation Evidence. Examples of documentation evidence included environmental correspondence, meeting minutes from C-17 conferences, press releases and news articles. These documents were primarily useful for corroborating other evidence obtained from observations and interviews. Additionally, several key aircraft deployment (beddown) documents were reviewed for data regarding environmental planning and observed impacts of this major federal action. Documents reviewed include the environmental impact analysis documents prepared for the C-17 and the specific Charleston AFB beddown Environmental Assessments. Base spill plans were reviewed, along with other environmental documents such as the hazardous waste management plan, permit applications and any applicable environmental notices of violation.

All documents were organized using a checklist prepared by the researcher. This checklist is in Appendix A. Documents were sorted by date and subject to allow for more convenient analysis. Document review occurred approximately two years after deployment of the initial C-17 aircraft at CAFB.

Interviews. Over 25 interviews were conducted with installation personnel to collect information regarding environmental planning predictions compared to actual field experience. A list of interviewed individuals, and the interview protocol can be found in Appendix B. Standard introduction questions regarding job title and time in position were used to begin interviews. Every interview included four questions which encouraged discussion about the Charleston AFB environmental program and the C-17. For example, interview participants were asked to describe how the C-17 beddown affected them on a scale of one to ten. Responses are listed in Appendix B. Follow-up questions were asked depending on individual experience level. Interviews were conducted with base personnel who could be expected to possess information regarding environmental impacts of a new weapon system.

Yin's interview techniques were applied to optimize information flow. Focused, open-ended interviews were employed to obtain facts and opinions from personnel at CAFB. The value of these type interviews is that they allowed key people at Charleston to provide evidence about the C-17 beddown. These people "not only provide the case study investigator with insights into a matter, but can also suggest sources of corroboratory evidence - and initiate the access to such sources" (Yin, 1989: 89).

The Air Force Environmental Compliance Assessment and Management Program (ECAMP) manual provides guidance regarding personnel to contact while conducting environmental investigations. Using this guidance, and personal experience, the researcher generated a list of the following personnel to interview:

Bioenvironmental Engineers
C-17 Deployment Coordinators
C-17 maintenance chiefs
Civil Engineers
Emergency response personnel
Environmental Management Staff
Local Environmental Regulators
Public Affairs Officer
Safety Office Representatives
Supply Personnel
Transportation Personnel

Interviewees were selected because their positions made them likely to observe impacts caused by the beddown of a new aircraft. Their unique perspectives can be used as input in the environmental planning process. Interviews were structured to allow interviewees to relate experiences, share data and make suggestions regarding other information sources. Interviews were conducted to explore both objective and subjective attitudes toward the success of environmental planning in the weapon system and potential for improvement.

Representativeness of the C-17 Acquisition Program

The C-17 is only one of many weapon systems which have been subject to NEPA requirements during their acquisition. Each weapon system is unique. The C-17

acquisition program is appropriate for study because it is the most recent major weapon system bedded down at an Air Force installation. General inferences can be made from this study inasmuch as there are facets of the acquisition process common to all weapon systems.

Answering the Research Questions

With evidence collected, three major analysis techniques were used to answer the research questions. An environmental postaudit was used to answer questions one and two. This postaudit is described in detail below. An acquisition environmental framework was constructed to answer question three, further, an evaluation of the beddown documentation was conducted to determine the quality of environmental planning for the C-17. The fourth research question was answered by analyzing the information presented for the first three questions.

Environmental Postauditing. The environmental postaudit for the C-17 acquisition and beddown involved comparing actual environmental impacts with those predicted in environmental planning documents. Actual impacts of the C-17 were observed during the data collection at Charleston AFB. Several sources of information were examined, and all data collected was compared with forecasted trends. For example, waste generation predicted in beddown planning documents was compared with actual field experience. Comparison areas were taken directly from the CAFB beddown Environmental Assessment. Section 3 of that document is entitled "Affected

Environment". It discusses impacts in ten broad categories. Environmental Consequences that were predicted in this document included the following ten categories:

General
Air Quality
Noise
Water Quality and Usage
Solid Waste/Sewage
Cultural Resources
Socioeconomics
Utility Usage
Construction
Unresolved Issues

The ten categories in the Environmental Assessment were expanded to a list of eleven categories for analysis. For example, Solid Waste and Sewage were analyzed as separate categories, whereas the 'General' category was classified and therefore not analyzed. If an impact occurred in a given category, several questions were asked to identify the root causes that contributed to the impact. The researcher was interested in determining the extent to which local conditions influenced environmental impacts. Evidence was examined to determine if other root causes could be identified. Each Category was evaluated to answer the following questions:

1. Was there an environmental impact?
2. If there was an environmental impact, was it positive or negative?
3. Were predictions accurate?
4. If there was an environmental impact, was it because of local conditions, or could it have been expected to be an impact at any Air Force Installation?
5. If there was an environmental impact, was it an issue that involved timing of information flow from aircraft developers to the field?
6. If there was an environmental impact, was funding a factor?
7. Were impact mitigation measures considered by the System Program Office?

The eleven categories are shown in Table 1. These categories and analysis questions form a matrix to grade the accuracy of environmental documentation. The matrix lists the factors that identify root causes of impacts. For example, if an impact occurred that was based solely on local conditions, this information can be determined from a cursory inspection of the matrix.

TABLE 1: Matrix of Environmental Categories and Evaluation Areas

CATEGORY	Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
Air Quality						
Noise						
Water Quality						
Water Usage						
Solid Waste						
Sewage						
Cultural Resources						
Socioeconomics						
Utilities						
Construction						
Unresolved Issues						

Evidence from Charleston AFB was gathered in order to judge whether an impact was positive, negative or negligible. Negative impacts were indicated by one or more problems for a given category. Definitions from the Air Force Environmental Compliance Assessment and Management Program (ECAMP) were used to identify problems at the base. ECAMP defines three types of environmental problems. Significant problems pose immediate danger to humans or the environment, and usually result in a Notice of Violation (NOV). Major problems are serious, but do not present immediate threat. Minor problems are typically administrative in nature and can be easily

fixed. These problems are often documented in ECAMP reports or through NOVs from local regulators.

Constructing a Framework for Environmental Planning in Acquisition. The second step in the methodology involved using historical data to construct a framework for evaluation of C-17 environmental planning. The objective of this exercise was to determine what guidance existed for acquisition environmental planners in the 1980s. Once this framework was constructed, the actual experience of the C-17 program could be compared against it. This was accomplished by conducting interviews and reviewing documentation at the C-17 SPO and Aeronautical Systems Command (ASC) Headquarters at Wright-Patterson AFB.

This research reviewed the major milestones of the C-17 acquisition and explored where environmental planning fit into that process. Using case study guidance provided by Yin (1989), planning documents such as the Programmatic Environmental Assessment and CAFB C-17 Beddown Environmental Assessment were analyzed to determine the following:

- a. When was the planning accomplished?
- b. Who did the environmental planning?
- c. What guidance was used?
- d. Did the planning documents appear to be complete?
- e. What impacts were predicted by environmental documentation?
- f. How did environmental planning fit into the acquisition process?

Based upon available guidance, a flow chart of model environmental planning steps for acquisition and beddown is presented in Appendix C. To put the actual C-17 acquisition process in perspective, significant events, such as major milestones and completion of environmental documents, were compiled into a timeline. This timeline is presented in Appendix D. It was a useful tool for analyzing the environmental planning for the weapon system.

Evaluating the Quality of Environmental Documentation. Key documentation regarding the extent of environmental planning during the C-17 acquisition process are Environmental Assessments. One EA was prepared for the C-17 program and one EA was prepared specifically for Charleston AFB. The Charleston EA was evaluated using criteria developed by Jain (1993). The programmatic EA was not similarly evaluated but is discussed separately. Twenty criteria described by Jain to evaluate the quality of environmental documentation are listed below. The evaluation criteria address key issues with environmental assessment: (1) impact identification, (2) impact measurement, (3) impact interpretation and (4) impact communication (Jain, 1993:120).

Evaluating Impact Identification. The criteria used to evaluate impact identification included the following:

Comprehensiveness: A full range of direct and indirect impacts should be addressed, including ecological, physical-chemical pollution social-cultural, aesthetic, resource supplies, induced growth, regional economy, employment, induced population or wealth redistributions, and induced energy or land use patterns

Specificity: The methodology should identify specific parameters (subcategories of impact types), i.e. detailed parameters under the major environmental categories of air, water, ecology, etc., to be examined

Isolate project impact: Methods to identify project impacts, as distinct from future environmental changes produced by other causes, should be employed.

Timing and duration: Methods to identify the timing (short-term operational versus long-term operational phases) and duration of impacts should be employed.

Data sources known: Identification of the data sources used to identify impacts should be required. Data sources should also be listed for impact measurement and interpretation.

Evaluating Impact Measurement. The criteria used to evaluate impact measurement included the following:

Explicit indicators: Specific measurable indicators to be used for quantifying impacts on parameters should be used.

Magnitude provided: The methodology should provide for measurement of impact magnitude, as distinct from impact significance.

Objective measurement: Objective rather than subjective impact measurements should be emphasized. Professional judgments should be identified as such, although they may be the only criteria available in many cases.

Evaluating Impact Interpretation. Evaluation of the interpretation and communication criteria is a more subjective exercise than evaluation of identification and measurement criteria. Impact interpretation issues appear to relate to the spirit of the NEPA rather than the letter of the law. Analysis of these criteria provided insight into whether the environmental assessment was a decision making tool or simply a documentation requirement. Similarly, analysis of the impact communication criteria indicated whether or not the documentation was prepared for public review.

The criteria used to evaluate impact interpretation included the following:

Significance scaled: Explicit assessment of the significance of measured impacts on a local, regional and national scale should be provided.

Criteria explicit: A statement of the criteria and assumptions employed to determine impact significance should be required.

Uncertainties made known: An assessment of the uncertainty or degree of confidence in impact significance should be required.

Risks identified: Identification of any impacts having low probability but high damage or loss potential should be required.

Alternatives compared: A specific method for comparing projects, including the no action alternative, should be provided

Impacts aggregated: The methodology should provide a mechanism for aggregating impacts into a net total or composite estimate. If aggregation is included, specific weighting criteria or processes to be used should be identified.

Public involvement seen: The methodology should include a mechanism for public involvement in the interpretation of impact significance.

Evaluating Impact Communication. The criteria used to evaluate impact communication included the following:

Affected groups visible: A mechanism for linking impacts to the specific geographical areas or social groups should be required and suggested.

Setting described: A methodology should require that the project setting be described to aid statement users in developing adequate overall perspective.

Format for summary: A format for presenting, in summary, the results of the analysis, should be provided.

Key issues highlighted: A format for highlighting key issues and impacts identified in the analysis should be provided.

Match NEPA regulations: Guidelines for summarizing results in terms of the specific points highlighted in NEPA and CEQ regulations should be provided.

Although these criteria were originally created to evaluate different approaches to environmental assessment, they are equally as effective in evaluating already completed assessments. Table 2 shows the scores in each category (Jain, 1993:123).

Table 2: Evaluation Criteria Scoring System

Score	Interpretation
Y	Yes (Meets Criteria).
M	Marginal (Partially meets criteria).
N	No (Does not meet criteria or minimally meets criteria).

Table 3 contains a listing of the 20 criteria and a column format for scoring environmental assessments.

Table 3: Environmental Document Evaluation Criteria

CRITERIA	SCORE (Y/M/N)
Comprehensiveness	
Specificity	
Isolate project impact	
Timing and duration	
Data sources known	
Explicit indicators	
Magnitude provided	
Objective measurement	
Significance scaled	
Criteria explicit	
Uncertainties made known	
Risks identified	
Alternatives compared	
Impacts aggregated	
Public involvement seen	
Affected groups visible	
Setting described	
Format for summary	
Key issues highlighted	
Match NEPA regulations	

Summary

Using published guidance regarding data collection and analysis methodologies, a plan was developed to collect and organize information regarding the beddown of the C-17 at Charleston AFB. The methodology described in this chapter was used to directly answer the first three research questions. This information was combined to answer question number four. Results are reported in chapter 4, Analysis.

IV. Analysis

Chapter Overview

This chapter presents the results of employing the methodology described in chapter three. Research questions were answered through a series of tasks which examined the environmental impacts of the beddown of the C-17 at Charleston AFB, compared them to predicted impacts, and finally evaluated the quality of the environmental planning documents themselves. The role of environmental planning in the acquisition process was explored by building a framework of ideal planning and comparing actual field experience against that background. The information collected was used to make inferences about acquisition environmental planning. Those inferences are discussed in the following chapter.

Environmental Impacts At Charleston AFB

The initial two research questions ask:

1. What environmental problems occurred during the beddown of the C-17
2. Which, if any, CAFB environmental problems resulted from unique local environmental requirements or conditions?

Information collected at Charleston AFB in June 1995 was indexed and organized to determine if there were any significant, major or minor environmental problems caused by the beddown of the C-17. Evidence was analyzed using the definitions of significant, major and minor findings described in the AF Environmental Compliance Assessment and Management Program manual. The results of this analysis are presented below.

No significant or major environmental problems were reported for Charleston AFB during the first two years of the beddown. Additionally, no Notices of Violation (NOVs) were issued to CAFB that can be attributed to the C-17. One example of a minor problem was the disposal of large amounts of hazardous material because its shelf life had expired. Prior to proper labeling and disposal, the unusable material could have been construed as improperly stored hazardous waste. Fast action by the base environmental office and hazardous material pharmacy avoided a possible compliance violation.

Environmental categories that were evaluated are summarized in Table 4 below.

Table 4. Environmental Impacts of the C-17 at CAFB

CATEGORY	Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
Air Quality	+	Y	N/A	N/A	N/A	Y
Noise	+	Y	Y	N/A	N/A	Y
Water Quality	0	Y	N/A	N/A	N/A	N
Water Usage	0	Y	N/A	N/A	N/A	N
Solid Waste	-	N	N	N	N	Y
Sewage	0	Y	N/A	N/A	N/A	N
Cultural Resources	0	Y	N/A	N/A	N/A	N
Socioeconomics	+	Y	Y	N/A	N/A	N
Utilities	0	Y	N/A	N/A	N/A	N
Construction	-	N	N	Y	Y	N
Unresolved Issues	0	Y	N/A	N/A	N/A	N

Each category is discussed in detail in the following section. For each category, environmental impact was determined based upon available evidence. This evidence, presented in paragraph form, refers to interviews, documents and observations listed in the bibliography of this report. Where impacts were observed, several possible root causes were explored to determine if the impacts could have been reduced or eliminated.

Air Quality

The C-17 had a positive impact on air quality at CAFB. Although portions of the beddown Environmental Assessment remain classified, the C-17 programmatic EA contains useful information for comparison of predicted versus actual impacts in the air quality arena. The positive impact is due to the fact that newer F-117 engines on the C-17 produce less emissions than the TF-33 engines on the C-141 aircraft they replaced (South Carolina Department of Health and Environmental Control (SCDHEC), 1994).

The beddown EA effectively described the existing environment, noting regulatory requirements and local conditions. At the time the EA was prepared, air quality in Charleston county was within standards for all pollutants. This was also true during the case study research period. The EA reported that except for carbon monoxide, CAFB emissions were generally small compared to point source emissions in Charleston County. In fact, based on Charleston County point source emissions for 1988, “military aircraft at Charleston AFB amount[ed] to 72% of the county’s CO emissions, 14.6% for hydrocarbons (HC), 10.6% for NO_x, 0.42% for [Total Suspended Particulates] and 0.57% for SO₂” (Department of the Air Force, 1989: 8).

Review of emissions data and an interview with the CAFB air program manager (Powell, 1995) confirmed relatively low quantity of air emissions. This information was corroborated in an interview with the District Director of the South Carolina Department of Health and Environmental Control (Fanning, 1995). Table 5 contains a summary for air quality impacts.

Table 5: Summary of Air Quality Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
+	Y	N/A	N/A	N/A	Y

Noise

The C-17 had a positive impact on noise at CAFB. The C-17 has quieter engines than the C-141 it replaced (LPA Group, 1993). This was explained in the EA and confirmed during document review and interview with the CAFB community planner (Youngblood, 1995). Further discussion of the improved engines appears in the Charleston AFB Joint Land Use Study prepared in 1993:

With reference to the airfield, the introduction of the new C-17 Globemaster III aircraft takes advantage of the latest noise emission reduction and fuel efficiency technological advances available. This aircraft is substantially quieter than previous large military aircraft types based at the airfield, and demonstrates the military's commitment to the aircraft noise impact reduction and abatement program, within the limits of new and available technology.
(LPA Group, 1993: 3-2).

No discussion of noise impacts was included in the earliest environmental planning documents prepared by ASD in 1981. It was clear early on that the newest cargo jet would benefit from technological advances in noise abatement. Table 6 contains summary information regarding the impacts of the C-17 and how these compare with predictions.

Table 6: Summary of Noise Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
+	Y	Y	N/A	N/A	Y

Water Quality

The C-17 had no observable impact on water quality at CAFB. The environmental assessment predicted no impacts at CAFB, and this was confirmed by interviews with local regulators (Fanning, 1995). Table 7 summarizes water quality impacts.

Table 7: Summary of Water Quality Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
0	Y	N/A	N/A	N/A	N

Water Usage

The C-17 had no observable impact on water usage at CAFB. This was as predicted in the environmental assessment, which based its analysis on the assumption that there would be a small number of personnel at CAFB. Table 8 shows water use at Charleston AFB for the period Jan 1992-May 1995 (Beneway, 1995).

**TABLE 8: Monthly Water Use (KGAL),
Charleston AFB, South Carolina**

	1992	1993	1994	1995
Jan	29627	18343	29019	37812
Feb	19960	15730	21349	23248
Mar	18002	25452	24934	27796
Apr	20655	28613	33099	25159
May	21002	27269	43939	31683
Jun	24104	43910	34578	
Jul	25760	39282	33909	
Aug	22348	31692	21443	
Sep	10617	27648	28003	
Oct	25080	27067	21230	
Nov	16832	24859	16445	
Dec	17107	20906	21556	

A graphical presentation of the water usage is shown in Figure 3.

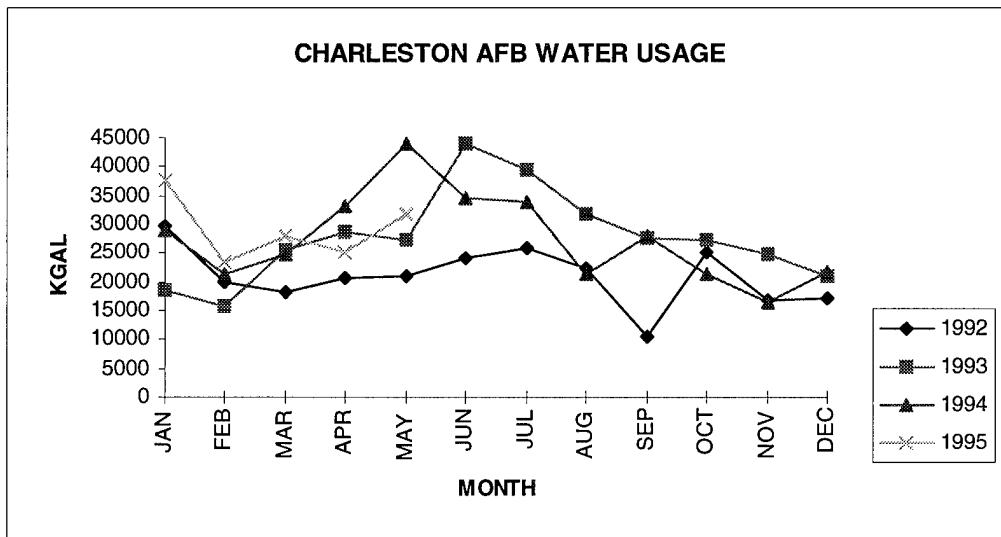


Figure 3: Annual Comparison of Water Usage at CAFB

One-way analysis of variance was used to determine if the differences in mean water use per month were statistically significant. The analysis is contained in Appendix E. It shows that there was no statistically significant change in water use from 1992-1995. The environmental assessment predicted a decrease in water use of approximately 3900 Kgal/month. This is a very small decrease compared to the monthly average of over 25,000. In fact, water usage increased slightly during the analysis period, though the increase was not statistically significant. Table 9 summarizes water usage impacts.

Table 9: Summary of Water Usage Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
0	Y	N/A	N/A	N/A	N

Solid Waste

The C-17 had no observable impact on nonhazardous solid waste production at CAFB, but caused minor hazardous waste disposal problems. The EA predicted that solid waste production would decrease by approximately 1759 pounds per day. This equates to approximately 26 tons less waste each month, or over 315 tons per year. "Minor reductions of solid waste would be expected from the withdrawal of personnel and their families. The estimated number of personnel involved, including families [was] 533" (Department of the Air Force, 1989: 54).

Actual solid waste generation is shown in Table 10 (Pape, 1995). Hazardous waste generation is shown in Table 11 (Cummings, 1995). No predictions are made regarding hazardous waste, which is often a subset of solid waste. In fact, hazardous waste is not referenced at all in the EA. Remarkably, acquisition personnel performed in depth pollution prevention planning shortly after the EA was published. This is discussed further in the conclusion chapter of this thesis. No documents from Aeronautical Systems Center contain discussion of solid waste issues.

Table 10: Solid Waste Generation

	FY92	FY93	FY94	FY95*
Tons	3964	3912	4119	3940

* - Projected based on 8 months generation records

Table 11: Hazardous Waste Generation

	FY92	FY93	FY94	FY95**
Tons	154	116	150	129

** - Projected based on 6 months generation records

One of the few problems observed at Charleston AFB involved hazardous waste disposal. McDonnell Douglas C-17 maintenance personnel stored hazardous materials beyond the listed shelf life and were unaware of proper disposal procedures. The quantity and type of hazardous material was sufficient to warrant a Notice of Violation if discovered by environmental regulators. Additionally, the chemicals presented a safety hazard. However, fast action by the environmental office and the hazardous material pharmacy righted the situation. Disposal was expedited for the cache of hazardous materials.

CAF B records show that McDonnell Douglas disposed of 2600 pounds of hazardous material from 18 April 1995 through 8 June 1995. More than two thirds of this was outdated hazardous material. Overall, McDonnell Douglas turned in 3230 of the 13,238 pounds of hazardous waste generated by the C-17 (Pape, 1995). Hazardous material management has improved significantly since the discovery of the outdated material. McDonnell Douglas representatives quickly adopted better procedures for ordering, storing and disposing hazardous material. Lessons learned from this experience are discussed in the conclusion chapter of this thesis.

Table 12 summarizes solid waste impacts at CAFB.

Table 12: Summary of Solid Waste Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
-	Y	N	N	N	Y

Sewage

The C-17 had no observable impact on sewage at CAFB. The data in Table 13 reflects wastewater produced at Charleston AFB for the period Jan 1992-May 1995 (Beneway, 1995).

**TABLE 13: Monthly Wastewater Production (KGAL),
Charleston AFB, South Carolina**

	1992	1993	1994	1995
Jan	46385	38807	20446	44917
Feb	46385	30876	23577	33289
Mar	46328	23758	21993	33334
Apr	46328	34227	29087	33334
May	46329	28108	21190	24151
Jun	33662	22585	27363	
Jul	26182	18733	30127	
Aug	30670	11030	34341	
Sep	34422	21240	37592	
Oct	28035	19651	49256	
Nov	26587	27039	30836	
Dec	27039	21183	31288	

The CAFB Environmental Assessment predicted a decrease in wastewater production of approximately 1481 Kgal/Month. This compares to a monthly mean of 30,850 Kgal/Month during the period of analysis.

One-way analysis of variance was used to determine if the annual differences in mean wastewater production per month were statistically significant. The analysis shows that 1993 sewage production was significantly lower than 1992 production. However 1994 and 1995 numbers were not significantly different from 1992. Possible reasons for the decrease in 1993 are discussed in the conclusion chapter.

A graphical presentation of the sewage is shown in Figure 4.

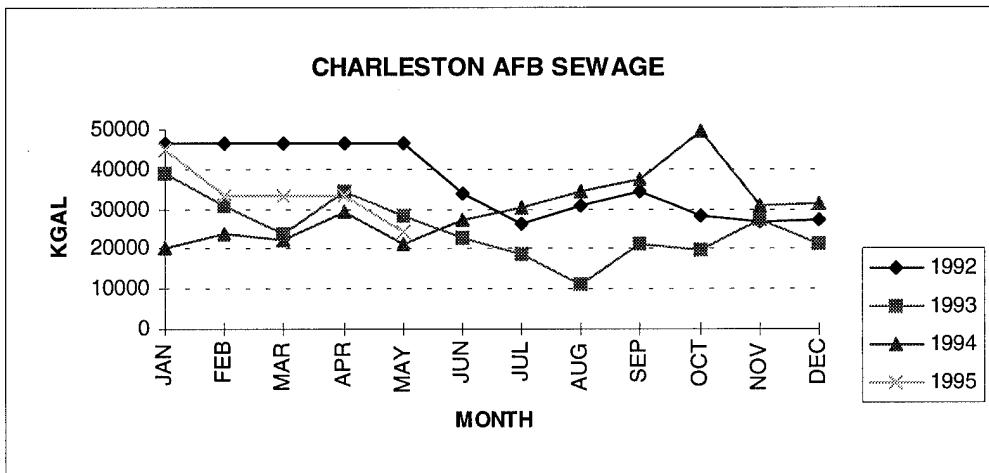


Figure 4: Annual Comparison of Sewage at CAFB

There is no record that the C-17 SPO, or ASD ever considered sewage impacts in early environmental analysis. Nor does there appear any need for such consideration. Table 14 presents a summary of sewage impacts.

Table 14: Summary of Sewage Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
0	Y	N/A	N/A	N/A	N

Cultural Resources

The C-17 had no observable impact on cultural resources at CAFB. Cultural resources include "the sum of historic, archeological, native American and other resources which antedate modern American Culture (generally 1950, with some

exceptions)" (Jain, 1993: 292). These resources are typically protected from certain activities by the National Historic Preservation Act. None of the C-17 beddown activities impacted cultural resources at CAFB (Youngblood, 1995). Table 15 summarizes the cultural resource impacts at Charleston AFB.

Table 15: Summary of Cultural Resource Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
0	Y	N/A	N/A	N/A	N

Socioeconomics

The C-17 had a positive impact on socioeconomics at CAFB. The local economy had been impacted by the loss of jobs from the closure of Charleston Naval Shipyard, and the beddown of the C-17 generated revenues to help offset that loss.

The Environmental Assessment broke the socioeconomic analysis into five components. These included (1) Population, (2) Secondary Jobs, (3) Other Socioeconomic Effects, (4) Prime Farmland and (5) Installation Restoration Program. Because a reduction in personnel was expected at the base, the environmental assessment predicted a small impact on local business, offset by an increase in construction investment during the beddown.

Cumulative effects of mission change with related federal activities such as Charleston Naval Shipyard were not discussed in the environmental assessment.

The EA reported:

The population of the Charleston region in 1980 was 430,462 and the projection for 1990 was 541,300. If all the personnel whose manpower authorizations are lost in this action leave the area, the change is -0.09% of the 1990 projection.

Because of the secondary economic impacts, we would expect a loss of 353 secondary jobs in the region.

We expect changes in other areas, such as reductions in the revenues, federal impact aid to education as well as state education funds; charitable contributions; minor reductions in housing demand, etc ... There will also be beneficial impacts expected due to construction.

This action will not cause a decrease in prime farmland being used for agricultural purposes.

This proposal will not affect the IRP. (Department of the Air Force, 1989: 55).

The 1995 Commander's Summary was a document released by the 437th Airlift Wing to provide "an overview of the major development considerations" (Department of the Air Force, 1995: 1). It provided a base profile and Charleston area profile with socioeconomic factors similar to those discussed in the 1989 environmental assessment.

Some facts from this document include:

From 1980 to 1990, Charleston County grew by 18,483 people (7 percent) to an estimated population of 295,039. The population of North Charleston grew by 7,739 people (12 percent) between 1980 and 1990 to a total population of 70,218.

Charleston County, including Charleston AFB, had a civilian labor force of 144,600 people in 1993, of which 135,750 [93.9%] were employed.

Approximately 4,600 active-duty military personnel, 2,900 reservists and 1,225 civilians are assigned to, or employed by Charleston AFB. The combined military, reservist and civilian workforce is approximately 8,725, which is nearly 28 percent of the estimated 31,000 military personnel in the Charleston area. (Department of the Air Force, 1995: 1).

The difficulty in comparing environmental assessment predictions with actual data from 1995 is discussed in the conclusion chapter of this thesis. Table 16 summarizes socioeconomic impacts.

Table 16: Summary of Socioeconomic Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
+	Y	Y	N/A	N/A	N

Utilities

The C-17 had no observable impact on utilities at CAFB. This was predicted by the environmental assessment, because no major change in the facility capacity was expected. The following data reflects energy used by Charleston AFB for the period Oct 1990-May Sep 1994 (Beneway, 1995).

**TABLE 17: Monthly Energy Use (MBTU),
Charleston AFB, South Carolina**

	FY91	FY92	FY93	FY94
Oct	25.960	15.361	23.688	25.613
Nov	36.580	48.150	35.236	34.445
Dec	46.610	49.923	50.337	50.637
Jan	54.280	57.603	49.153	56.525
Feb	43.660	49.036	48.857	45.043
Mar	43.070	36.039	49.745	38.272
Apr	19.175	18.906	29.610	15.309
May	19.175	15.952	15.397	16.486
Jun	19.765	18.610	18.062	17.958
Jul	20.355	20.973	21.023	21.197
Aug	20.650	18.315	18.950	18.842
Sep	15.340	11.816	11.844	12.954

One-way analysis of variance was used to determine if the differences in mean energy use per month were statistically significant. The analysis showed no significant difference between mean monthly energy use for the period FY91-FY94. Although the CAFB environmental assessment predicted an extremely small increase in energy usage due to larger buildings, energy usage actually decreased in FY94. This appears to be due to warm weather in March and April. Table 18 summarizes the impacts on CAFB utilities.

Table 18: Summary of Utilities Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
0	Y	N/A	N/A	N/A	N

Construction

The C-17 had a negative impact because of construction at CAFB. This was due in large part to the fact that more construction was required than originally planned. Initially, planners hoped to use existing C-141 hangars for the C-17. This was based on the assumption that the C-17 wingspan was slightly shorter than the C-141. In fact, the winglets added 10 feet to the width of the aircraft, requiring hangar modifications. Additionally, since the beddown location was officially classified, several early facility decisions were made without local coordination (May, 1995). As a result, the winglet discrepancy was not discovered until late in the beddown timetable, when several facilities were required to be constructed. This change in plans required additional permits and funding typical for large military construction projects.

Table 19: Summary of Construction Impacts

Impact (+,-,0)	Prediction Accurate (Y/N)	Local Issue (Y/N)	Timing Issue (Y/N)	Funding Issue (Y/N)	Considered by SPO (Y/N)
-	N	N	Y	Y	N

Unresolved Issues

The beddown EA noted that there were limiting factors in the analysis. “The initial flight of the C-17 has been scheduled for December 1990: The lack of an existing aircraft and the amount of remaining time before the initial beddown will further complicate this analysis” (Department of the Air Force, 1989: 56). One area that the EA could not address was the airspace near Charleston AFB that the C-17 would use for low level training. The Military Airlift Command planned to address airspace issues in a separate analysis.

Other unresolved issues impacted the Charleston AFB community. The acquisition process was lengthened by substantial Congressional oversight. This affected beddown timetables and added uncertainty to the planning process. The question about the number of C-17s that Congress would authorize magnified the uncertainty. Finally, Charleston AFB was responsible for many facets of the Congressionally mandated Reliability, Maintainability and Availability Evaluation (RM&AE). This evaluation required off-site operations at several locations, including Barstow-Dagget Airfield in Southern California, where a fuel spill made authorities aware that no environmental planning existed for deployed locations. The ramifications of this discovery are discussed in the conclusion chapter of this thesis.

Framework for Environmental Planning in Acquisition

The third research question asks:

3. How were CAFB environmental issues addressed during the C-17 acquisition process?
--

Appendix C contains a flow chart which summarizes current environmental planning guidance available to weapon system program managers. Although the C-17 was developed before this guidance was created, the flow chart provides a model for comparing current and historic practice.

The first issue to address in answering research question number three is determining who was responsible for environmental planning. Next, it is critical to know when the planning was done and what kind of guidance existed at the time. Finally, it is instructive to review *how* the analysis was completed and *why* it failed to address some key issues. As Yin suggests, a case study such as this one is “appropriate when a ‘how’ or ‘why’ question is being posed” (Yin, 1989: 20). Here the case study focused on events at Wright Patterson AFB that preceded the decision to base the C-17 at Charleston AFB.

Who Performed C-17 Environmental Planning?

The earliest C-17 environmental planning documents were prepared in 1981. At that time, the aircraft was in the exploration and definition phase, and was known as the C-X. Environmental planning for a new weapon system such as the C-X was accomplished by Aeronautical Systems Division (ASD) staff. The ASD environmental staff consisted of two people. They faced the challenge of compliance with little guidance or support. “It

was not unusual in 1981 to find small environmental staffs. More emphasis is placed on environmental issues now. Today there are more like 35 people working here" (Lawrence, 1995). The small staff reflected the fact that environmental planning was not a high priority in acquisition at the time.

According to a DoD Inspector General Audit Report, prior to 1993, environmental planning was a low priority in all the military department Major Defense Acquisition Programs (MDAPs). The Inspector General found that DoD priorities were focused on installation compliance and cleanup, rather than acquisition.

Military Departments did not establish a means for the environmental engineers and the acquisition community to exchange information on environmental consequences of MDAPs. Overall, this orientation of environmental planning towards facilities and installations occurred because DoD and the Military Departments have not established environmental planning as a priority for MDAPs. (Department of Defense, 1993: 25)

Knowledge of who prepared early environmental documentation provides insight into the analysis. Clearly, lack of guidance and staffing influenced the quality of environmental planning. This lack of guidance became very clear when ASD attempted to supplement the C-X environmental assessment in 1989-1990. The ASD environmental planners updated the EA to include updated information for the C-17. They submitted several drafts to Air Force Systems Command (AFSC) for approval. In November 1990, the legal staff at AFSC declared that there was no CEQ or NEPA regulation that required EAs to be supplemented. They explained:

The data contained in the updated EA does not appear to be "significant" from a NEPA standpoint, as it still leads to a finding of no significant impact. Based on these considerations, there does not seem to be any regulatory requirement to prepare a supplemental EA at this juncture. (Headquarters Air Force Systems Command, 1990)

A supplemental EA with C-17 data never replaced the C-X EA. No further programmatic environmental assessments were prepared for the C-17. This was unfortunate for the planners at Headquarters Military Airlift Command (HQ MAC), who needed baseline C-17 information to prepare the Charleston AFB beddown EA.

In the case of the CAFB beddown EA, the staff at HQ MAC originally planned to abbreviate the NEPA process by using a Categorical Exclusion, the lowest level of environmental analysis (Calliot, 1995). The idea was that because each C-17 would replace one C-141, no in-depth environmental planning was required. However, Headquarters Air Force required HQ MAC to prepare an EA. In 1989, when the CAFB beddown EA was prepared, HQ MAC staff faced manpower challenges similar to those at ASD. These factors influenced the quality of the beddown EA. Another complicating factor is that the beddown EA was accomplished in a very short period because of the decision to require more analysis than just a Categorical Exclusion. In many respects, HQ MAC staff produced a high quality document considering the time, manpower and budget constraints they faced.

When Was Environmental Planning Accomplished for the C-17?

Environmental planning guidance was sparse in the acquisition community in 1981. In fact, the Air Force did not publish its Environmental Impact Analysis Process (EIAP) regulation until August 1982 -- twelve years after the passage of the NEPA. With limited guidance and resources, the Aeronautical Systems Division staff produced an

environmental assessment for the C-X aircraft, anticipating that DoD would acquire a new cargo aircraft. The planners knew the C-X EA was generic and incomplete, but they at least had a framework for future planning documents. Their hope was that other planners could use the baseline information to improve upon the initial work.

It appears that the C-X EA was the only NEPA document released by ASD that addressed C-17 planning issues. The efforts to update the assessment in the late 1980s consumed a large amount of ASD staff time, but never resulted in an official document. As a result, when HQ MAC staff attempted to produce an expedited beddown EA in 1989, they spent time and resources gathering information that should have been already available. Had the quality of early EA documents been better, they would have presented an excellent opportunity for “tiering”. The Code of Federal Regulations (CFR) defines tiering:

Tiering refers to the coverage of general matters in broader environmental impact statements with subsequent narrower statements or environmental analyses, incorporating by reference the general discussions and concentrating solely on the issues specific to the statement subsequently prepared. (Code of Federal Regulations, 1995)

Because of the lack of data in the C-X environmental assessment, tiering was not a viable option for HQ MAC in 1989.

In 1991, ASD initiated the C-17 Environmental Working Group (EWG). The EWG began as a subcommittee of the Logistic Support Analysis Record (LSAR) Data Review Group. This group was formed to validate technical procedures and processes concerning the C-17. Monthly EWG meetings were hosted by McDonnell Douglas at their headquarters in Long Beach California. Representatives included personnel from

McDonnell Douglas, the SPO and CAFB personnel. Issues such as pollution prevention and Ozone Depleting Chemicals (ODC) elimination were discussed at these meetings. The key issues were how to eliminate ODCs without impacting the reliability, maintainability and availability of the aircraft.

In 1991, the C-17 System Safety Office assigned was assigned as new office of primary responsibility for environmental issues. The Director of System Safety, a field grade officer, assumed responsibility for the increasingly complex environmental arena. Finally in 1993, ASC assigned an officer to solely manage environmental issues.

How Was Environmental Documentation Prepared?

In 1981, when ASD environmental staff began documenting their analysis, the only information they had available was noise engine emission data for a range of possible aircraft. Using the NEPA, and CEQ regulations, they produced a generic ten page programmatic EA. This EA contained key ingredients required by law, including a Description of the Proposed Action and Alternatives. The table of contents from that document is shown in Table 20. It is instructive to analyze these contents in order to develop perspective for the acquisition environmental planning that followed.

In 1989, when HQ MAC prepared the beddown analysis for Charleston AFB, much more guidance was available. AFR 19-2 contained specific Air Force guidance, including a list of Categorical Exclusions to abbreviate the environmental planning for routine actions. But at least one person at HQ Air Force believed that the C-17 beddown at Charleston required an EA. HQ MAC had to change plans to apply CATEX 2Y:

“Proposed actions that are of such environmentally insignificant nature they clearly do not meet the threshold for requiring an environmental assessment or EIS” (Department of the Air Force, 1982: 65). As a result, due to limited time and resources, the beddown EA was published with the limitations described in the following section.

Table 20: Contents of May 1981 Environmental Assessment for C-X Aircraft

		Page No.
I	Description of Proposed Action and Alternatives A. Purpose B. Proposed Action 1. General 2. Contractor/Engine Candidates C. Alternatives 1. No Action 2. Acquire Other Existing Aircraft	1
II	Environmental Consequences A. Air Pollution 1. General 2. Environmental Protection Agency Standards 3. USAF Emission Goals 4. Airbase Air Quality B. Noise 1. General 2. Ground Noise 3. Flight Noise 4. Community Noise C. Energy Consumption 1. C-X Fuel Consumption 2. Energy Efficiency D. Accidents 1. Aircraft Crash 2. Fuel Dumping E. Alternatives 1. No Action 2. Procure Additional Existing Aircraft	2 5 6 7 7
III	Offices, Agencies and Persons Consulted Bibliography	8

Evaluation of Environmental Documentation

The unclassified portion of the CAFB beddown EA contains sufficient information to evaluate environmental planning for the first C-17 operational base. With few exceptions, the document met criteria for environmental assessment documentation. Some improvement areas were noted, and these are described below. Table 21 presents a summary of the evaluation.

Table 21: Environmental Document Evaluation

CRITERIA	SCORE (Y/M/N)
Comprehensiveness	Y
Specificity	Y
Isolate project impact	Y
Timing and duration	M
Data sources known	Y
Explicit indicators	N
Magnitude provided	M
Objective measurement	Y
Significance scaled	Y
Criteria explicit	M
Uncertainties made known	N
Risks identified	Y
Alternatives compared	N
Impacts aggregated	Y
Public involvement seen	N/A
Affected groups visible	Y
Setting described	Y
Format for summary	N
Key issues highlighted	N
Match NEPA regulations	Y

Y = Yes (Meets Criteria)

M = Marginal (Partially meets criteria)

N = No (Does not meet criteria or minimally meets criteria).

Comprehensiveness

The document meets the comprehensiveness criteria. A range of impacts was addressed by the beddown EA. The existing environment was analyzed for pollution impacts, ecological impacts and socioeconomic and cultural impacts. One weakness of the document is that discussion is abbreviated. For example, seven of the eleven environmental categories were covered in two pages of the document. The document was written as if the beddown decision was already made. For example, in the section entitled ‘Alternatives to Proposed Action’, the EA noted that “Charleston is the candidate to receive the first operational squadron because it was most cost effective and efficient and satisfies other requirements identified previously” (Department of the Air Force, 1989:6). Further, no discussion of cumulative effects was found in the document. A cynical observer might wonder why the EA was even written. Overall, however, the document meets the criteria by considering a wide range of possible impacts to the affected environment.

Specificity

The document meets the specificity criteria. The EA presented a systematic approach to the analysis, but in some cases lacked detailed discussion of the parameters to be examined. In the Air Quality arena, the document was very specific regarding units of measure and significance of impact. Yet in other areas such as solid waste, very little information was presented to quantify possible impacts. In many cases it appears as if initial assumptions were made regarding number of aircraft, and impacts were

perfunctorily reported based on these numbers. For example, the EA estimated that 533 personnel would be withdrawn from the base. Several figures such as gallons of water and pounds of solid waste disposal were reported without putting the numbers in context.

Isolate project impact

The beddown document meets the project isolation criteria. The assessment for this beddown was successful in focusing on the impacts of this action independent of other actions. A reader can easily determine the impact of C-17 beddown, apart from other environmental changes produced by other causes.

Timing and duration

The document marginally meets the timing and duration criteria. Short term impacts, such as construction debris and runoff, were discussed as well as the longer term concerns such as landfill life and water treatment volume. However, long term effects were not discussed in areas such as air quality and socioeconomic.

Data sources known

The document meets the data source criteria. In several instances throughout the document, sources were referenced to allow reviewers to follow up on data questions. The final two pages of the EA presented a list of references and personnel contacted.

Explicit indicators

The document does not meet the explicit indicators criteria. Specific measurable indicators for quantifying impacts are not identified or used. The EA focused on air quality standards and noise contours, but did not describe any parts of the affected environment that can be used as indicators.

Magnitude provided

The document marginally meets the magnitude criteria. It presented measurable, easy to understand predictions of impacts. However, it did not provide language to put the magnitude of impacts in perspective.

Objective measurement

The document meets the objectiveness criteria. It cited experts from the South Carolina Department of Health and Environmental Control. It used objective guidance from the Air Installation Compatible Use Zone (AICUZ) report to identify noise concerns in the Charleston AFB area. Data cited in the EA can be measured objectively (e.g. gallons of water used, percent population increase).

Significance scaled

The document meets the significance scaling criteria. It assessed the impact with regard to its importance in the local and regional scale. This is especially true in the socioeconomic discussion, where regional economy was discussed at length.

Criteria explicit

The document marginally meets the explicitness criteria. For air quality and noise analysis, the EA was very explicit regarding criteria. For the remaining categories, however, information was presented without explanation regarding standards or the meaning of the numeric information.

Uncertainties made known

The document does not meet the uncertainty identification criteria. It was written as if the decision to purchase and deploy 210 C-17 aircraft was already made. This was a faulty assumption, as evidenced by the acquisition history of the C-17. Uncertainty regarding the number of C-17s in the USAF inventory affects planning for the number of aircraft at Charleston AFB. Therefore, some discussion regarding the degree of certainty of the impact significance should have been included in the document.

Risks identified

The document meets the risk identification criteria. No high loss potential risks were identified during the analysis.

Alternatives compared

The document does not meet the alternative comparison criteria. Although three alternatives were presented, two were immediately discounted and not discussed any further in the EA. The EA was written as if the decision was already made.

Impacts aggregated

The document meets the impact aggregation criteria. It discussed all reasonable impacts that will occur if the beddown decision was made. It also considered scenarios where the beddown occurred, without a portion of the associated construction projects.

Public involvement seen

The public involvement criteria was not assessed since the environmental assessment was classified.

Affected groups visible

The document meets the visibility criteria. It discusses environmental impacts in terms of the effect on the surrounding community. Population is estimated immediately and concern for civilian agricultural activities is cited.

Setting described

The document meets the setting description criteria. Section two, 'Existing Environment' presents an overall perspective of the Charleston AFB environment. Several key features about the surrounding area are described in detail. Key features such as the high water table and airfield elevation are highlighted early in the document. Local environmental standards are described and environmental authorities are identified to provide an objective contact point for interested personnel. For example, ambient air quality standards for the state are compared with national standards.

Format for summary

The document does not meet the summary criteria. No summary tables are presented.

The document lacks an overview section to summarize the analysis approach and results.

This issue is discussed further in the conclusion chapter of this thesis.

Key issues highlighted

The document does not meet criteria for highlighting key issues. There was no executive summary, or attempt to differentiate key C-17 environmental planning issues from other discussion.

Match NEPA regulations

The document meets the NEPA regulation criteria. At the time the beddown EA was published, Air Force guidance consisted of Air Force Regulation 19-2, which was written to assist Air Force agencies comply with the National Environmental Policy Act. The document appears to follow AFR 19-2 guidance closely.

Lessons Learned

The fourth research question asks:

4. What lessons learned from the C-17 beddown at CAFB can be applied to other weapon system bedowns?
--

Evidence analyzed in this chapter will be discussed in the conclusion chapter. The answer to this question is derived from the information used to answer questions 1-3.

Summary

The evidence collected in this case study was analyzed to determine the effectiveness of environmental planning in the acquisition of the C-17 Globemaster III. In two of the eleven categories addressed in the CAFB Beddown EA, minor negative impacts were observed. Negative impacts were not caused by unique local conditions. However, in three categories, positive impacts occurred. The EA accurately predicted impacts in nine of the eleven categories.

A framework of environmental planning in acquisition was constructed to compare C-17 environmental history with current planning policy. C-17 environmental planning activities were described to show how they were accomplished and why they failed to address some key areas.

Finally, the CAFB Beddown Environmental Assessment was evaluated using criteria to determine the effectiveness of impact identification, measurement, interpretation, and communication. The EA failed to meet five of the twenty criteria evaluated. The results of this analysis are discussed in the following chapter.

V. Conclusions and Recommendations

Chapter Overview

This chapter summarizes the problem statement, methodology and results of this research. It presents conclusions from a case study of environmental issues related to the C-17 Globemaster at Charleston AFB. The discussion includes events from 1980, when C-17 development began, through 1995, when the first full squadron of C-17s was in place at CAFB. It focuses on the relationship between the environmental and acquisition history of the C-17. Conclusions describe the role of environmental planning in weapon system acquisition. Finally, the researcher recommends areas for further study.

Research Design

This research was designed to increase corporate understanding of the role of environmental planning in acquisition. Particular attention was focused on the period June 1993 - June 1995, when the first squadron of C-17s was gradually bedded down at Charleston AFB. Specifically, the research was designed to answer the four investigative questions listed previously, and repeated below:

1. What environmental problems occurred during the beddown of the C-17?
2. Which, if any, CAFB environmental problems resulted from unique local environmental requirements or conditions?
3. How were CAFB environmental issues addressed during the C-17 acquisition process?
4. What lessons learned from the C-17 beddown at CAFB can be applied to other weapon system bedowns?

The research questions guided the literature review, methodology and analysis presented in previous chapters. Conclusions were organized in order to answer the research questions in order. Each question will be addressed in turn in this chapter.

Conclusions

1. What environmental problems occurred during the beddown of the C-17?

Document reviews, personal interviews and site observations confirmed that three minor problems occurred during the beddown of the C-17. Two of the problems occurred on base during the beddown, and one occurred at a remote location where CAFB aircraft were flying aircraft evaluation missions. Although the latter of these problems did not occur at Charleston AFB, it is noteworthy because it impacted CAFB personnel.

The most serious problem that occurred during the beddown of the C-17 involved hazardous material management in a McDonnell Douglas maintenance hangar. The concept of operations in that hangar was to perform maintenance that Air Force C-17 personnel were not yet trained to do. This involved many chemicals that were used in a hangar not equipped for hazardous material storage. Several root causes can be identified for this problem.

Since production of the C-17 was concurrent with testing, several changes in maintenance and material were made during the beddown. This resulted in excess material such as adhesives, which later was disposed as hazardous waste. Because a small McDonnell Douglas (MD) team was contracted to perform interim maintenance

support during beddown, there was a problem with hazardous material supply. This problem was compounded by the fact that MD was required to design the C-17 so that it used material already in the government inventory. As a result, MD often was forced to use maintenance material that was more hazardous than state-of-the-art. Further, MD had to buy materials from the government, then bill it as part of a contract modification. The result of this system was that the contractor stockpiled a large quantity of hazardous material that was no longer usable for the C-17, or any other application on CAFB.

Although the hazardous material problem was minor, and quickly solved by good management, several lessons can be derived from the experience. One of the problems was that the hangar that was given to McDonnell Douglas had no provisions for hazardous material storage. Additionally, the, hazardous material was not used or inspected routinely. Further, the supply system was not conducive to purchasing small amounts of hazardous material. The latter problem may be solved by the new hazardous material pharmacy on base. Finally, requiring a contractor to use material already in the government inventory reduced opportunities for waste minimization. Current pollution prevention initiatives in the C-17 program address that issue.

The second problem during the beddown occurred when construction plans were increased due to the wing span of the C-17. The secrecy surrounding early C-17 facility support planning prevented installation engineers from identifying the winglet problem early in the planning process. As a result, expedited construction permit applications were required, and only limited environmental analysis was considered for the expanded construction.

The final problem with the beddown of the C-17 occurred during the Congressionally required Reliability Maintainability and Availability Evaluation. The RM&AE required Charleston crews to fly into Barstow-Dagget Airfield in California. As part of that operation, ground support, including fuel storage was required. When a fuel spill occurred during early training for the RM&AE, Charleston AFB environmental staff were required to expedite environmental planning for the site, and obtain permits to operate from Southern California regulatory authorities. The lesson learned is that the RM&AE is an exercise where acquisition requirements meet with installation operations, and improved coordination and planning are required to avoid environmental impacts caused by the testing phase of weapon system acquisition.

2. Which, if any, CAFB environmental problems resulted from unique local environmental requirements or conditions?

There are several reasons why Charleston AFB was an excellent choice for the beddown of the C-17. The base is in an air quality attainment zone, close to the Atlantic Ocean. The base enjoys compatible development with the surrounding area. The regulatory climate is friendly and cooperative. None of the problems noted above resulted from unique local requirements or conditions.

3. How were CAFB environmental issues addressed during the C-17 acquisition process?

The acquisition of the C-17 occurred during a period where environmental regulations were rapidly changing. When acquisition of the C-X aircraft was being debated, the Air Force had not yet even released its Environmental Impact Analysis Process (EIAP) regulation. Environmental compliance and pollution prevention were low priorities when the first C-17 was fabricated. However, in the early 1990s, several key events occurred that improved the environmental friendliness of the C-17. One month before the first test flight of the Globemaster III, the C-17 Environmental Working Group met in Long Beach California to “facilitate technical interchange between the developers, users and supporters of the C-17” (Aeronautical Systems Center, 1991).

Unfortunately, prior to 1991, the environmental history of the C-17 was similar to its acquisition history. Several environmental initiatives were begun but not finished. Most notably, the programmatic C-X environmental assessment remains the only C-17 NEPA environmental planning document completed by ASC. Even though one of the EWG objectives was to “ensure completion of the proper environmental documentation including an environmental assessment for the C-17 production program” (Aeronautical Systems Center, 1991), there is no evidence that this ever occurred.

Aeronautical Systems Division personnel became more proactive as the C-17 program matured. In March 1992, the program director for the C-17 released a letter outlining pollution prevention goals. Directors of logistics, engineering and system safety were all

tasked to keep the commanding general informed on pollution prevention progress. New chemicals were considered to replace the worst hazardous materials, provided they did not harm the aircraft. Simultaneously, Air Force leaders were reviewing technical orders to determine what uses of hazardous materials could be reduced or eliminated. Pollution prevention opportunities were sought out, and continue to be explored as Charleston AFB personnel become more familiar with C-17 maintenance tasks.

None of the NEPA documentation for the C-17 addresses pollution prevention issues. In fact, neither the C-X environmental assessment, nor the Charleston AFB beddown environmental assessment even address hazardous materials. This is in part because very little information was available in 1981 when the C-X EA was written. Further, the original plan was to apply a Categorical Exclusion to the beddown EA, so detailed analysis was only performed on the areas where data was readily available, such as noise and air emissions (Calliot, 1995).

Today, a new approach to environmental planning is being introduced by ASC. It consolidates all environmental issues into one Programmatic Environmental Assessment (PEA) document, of which NEPA planning is a part. The idea of the PEA is to evaluate the impacts of a weapon system on the environment, while considering the effects of environmental requirements on the weapon system over its life cycle (Nelson, 1995). The concept here is to track all acquisition environmental information in one place, where it is easily accessible for use in decision making. The PEA format is currently being revised by ASC so that a standardized format can be used by all weapon system program managers. An executive summary of the PEA is reviewed by the Defense Acquisition

Board prior to major program milestone decisions. This, above all, reflects the importance of environmental issues in the acquisition process.

4. What lessons learned from the C-17 beddown at CAFB can be applied to other weapon system beddowns?

One lesson learned from the C-17 beddown is that good communication between the aircraft provider (AFMC) and the weapon system user (e.g. AMC) enhances environmental quality. Although the relationship between the operational world and the acquisition world is difficult to describe due to the vast differences in language and daily requirements, it must be considered. A weakness in the DoD environmental climate was identified when the Inspector General noted that environmental attention was overly focused on installation cleanup and compliance, neglecting the acquisition world. Improved communications between aircraft operators, maintainers, and acquisition personnel will increase the efficiency of pollution prevention efforts, because the user can best identify problems, while the acquisition personnel can often provide the fix.

Another lesson learned from the C-17 is how to perform environmental assessments. Several improvement areas have been identified in this area. Much of the problem with C-17 environmental planning stems from the fact that the earliest efforts to comply with the NEPA predate good guidance. Before the C-17 was accepted by Congress, ASD's idea was to accomplish an assessment of the concept aircraft. This document was intended to be used as a baseline for future assessments, including beddown documents.

Unfortunately, because there was so much uncertainty related to the C-17 program, only a very generic environmental planning document was possible. At the time of the C-X draft, ASD environmental planners did not know who the aircraft contractor would be, or who would manufacture the engines. The good news was that there were specifications regarding engine noise and emissions because the aircraft would be FAA approved. Another lesson learned here is that information can be found in several places other than Air Force databases.

In theory, a good programmatic environmental assessment serves as a basis for the beddown documentation. In the case of the C-17, this did not occur, and early environmental documentation was very weak. Fortunately the beddown location was well suited for a new aircraft with low emissions and quiet engines. The beddown effort was not hindered by poor environmental planning in this case, but there certainly was potential for anyone to question the quality of NEPA documentation. For future beddowns, high quality environmental planning is a must.

Another problem noted by the researcher was that the environmental assessment had no discussion about hazardous material or hazardous waste management. Considering the volume of hazardous materials that are required to support the C-17, one would expect some discussion about their impact. In fact, these issues were addressed in a totally separate forum. This forum was the C-17 Hazardous Materials Working Group, chartered in 1991 (Cook, 1991).

One of the challenges associated with performing an environmental postaudit is that the units of measure may not be consistent. For example, in the 1989 EA, analysts

discussed the “Charleston Region” as the main area for looking at socioeconomic impacts. Yet in the 1995 commander’s summary (a document dedicated to discussion of economic impact of base development), Charleston County is the focus of socioeconomic discussion, and no mention is made of the “Charleston Region”. The problem here is that the sizes of the geographic areas are tremendously different, making comparison difficult at best. A lesson learned is that in environmental analysis, planners should strive for consistent units of measure.

Discussion of Results

One problem with this type analysis is the fact that the environmental planning was done at a time when much of the information about the initial beddown location was classified. Much of the analysis that would be important at a base cannot be completely done when there is so much uncertainty about the location and number of planes to be stationed at the location. One approach to this problem is to explicitly address the uncertainty, and analyze for best case, expected case, and worse case.

The idea of performing an environmental postaudit is instructive within certain bounds. First of all, there are few occasions when predictions can be directly compared to reality, because there are so many confounding factors. For example, the water supply and waste water data is sensitive to temperature and precipitation. A comparison of data from year to year must include some consideration of storms. Further, the quality of the data must be considered. There are cases where wastewater numbers were exactly the same for several months. Quite possibly a meter was not operating properly. This leads

an investigator to question the accuracy of the readings. However, more important than whether the data is highly accurate is the trends that it suggests. By noting trends, insight can be gained, though in this case the data was more interesting for what it did not show (impacts) rather than for what it did show (no significant changes).

A fair question may be ‘Was an EA even required?’ or ‘is study of the EA useful?’. The answer to both these questions is ‘Yes’, because the Air Force needs to know the environmental risks associated with aircraft beddown activities. Further, the Air Force needs to know if its environmental analyses are accurate inputs to the decision making process.

This research effort used tools to explore the NEPA planning process and determine if it was appropriately applied during the C-17 acquisition process. In the case of the C-17 at Charleston Air Force Base, early planning was weak and the environmental impacts were minimal. It would seem logical that poor environmental planning would result in a large number of impacts, but in this study that was not the case. One possible reason for these results is that although early planning was poorly documented, there was steady improvement as the acquisition proceeded. Further, independent USAF and McDonnell Douglas pollution prevention efforts were ongoing in the years prior to beddown. Finally, a capable and enthusiastic Charleston AFB environmental management team contributed to the beddown effort. All of these efforts helped mitigate C-17 environmental impacts.

Areas For Future Research

The researcher identified several areas for follow-on research:

1. Perform a similar case study at another Air Force base.
2. Collect data regarding the quality of environmental analysis documents in the U.S. Air Force.
3. Research the history of environmental planning in acquisition and develop a methodology to incorporate environmental requirements in timely manner.
4. Prepare environmental references and documentation to incorporate into the Air Force Acquisition Model (AFAM).
5. Research the effectiveness of Air Force Programmatic Environmental Analyses.
6. Study the cost and effectiveness of pollution prevention activities.

Summary

This thesis explored the role of environmental planning in the acquisition process. Conclusions were presented in this chapter. In the case of the beddown of the C-17 Globemaster III at Charleston AFB, few environmental impacts occurred. This does not appear to be because of outstanding planning, but rather because of agreeable local conditions and proactive environmental management just prior to the beddown of the aircraft. Several lessons were learned by the environmental planners and acquisition personnel associated with the C-17. Application of these lessons to future weapon system bedowns will improve the process and enable future planners to make better use of available environmental tools.

Appendix A: Checklist for Document Review

Date
Subject
Source
Water Issues?
Air Issues?
Hazardous Waste Issues?
Cultural Management Issues?
Noise Issues?
Corroborating Evidence?
Cross Reference Number of related evidence

Index of documentation evidence

1989 Environmental Assessment for C-17 Beddown at Charleston AFB
CAF B Hazardous Waste Management plan
CAF B Spill Plan
C-17 Hazardous Material Working Group Minutes
McDonnell-Douglas Publication: "C-17 News"
Bioenvironmental Engineering Reports
Air Permit
Construction Permits
Logistic Group Correspondence
Water Usage Reports
Wastewater Production Reports
Air Emission Reports

Appendix B : Interview Data

Interview References

Beneway, Capt Sandie, Deputy Chief, Environmental Management Flight, CAFB.

Bishop, Mr Randy, CAFB Environmental Compliance Technician

Blair, MSgt Gregory, CAFB Fuels Flight Environmental Manager

Braun, MSgt Michael, CAFB C-17 Maintenance Squadron Environmental Program Manager

Brewer, SSgt Edgar, CAFB Hazardous Material Pharmacy Customer Service Representative

Calliot, Ms Patricia, Former Environmental Planner, Military Airlift Command.

Clemons, SMSgt Tom, CAFB Aircraft Maintenance Superintendent

Coffey, MSgt Clayton, CAFB Hazardous Material Pharmacy Superintendent

Cook, Mr Dale, CAFB Logistics Group Environmental Manager

Cummings, Lt Stacey, CAFB Environmental Officer

Dean, Mr Bill, CAFB Environmental Compliance Monitor

Deese, Mr Harold, CAFB Environmental Engineer

Easterby, Mr Glenn, CAFB Chief of Environmental Management Flight

Fanning, Mr Wayne, Assistant District Director, South Carolina Department of Health and Environmental Control

Frazier, Capt Daryl, Officer In Charge, CAFB C-17 Sortie Generation Flight

Fuqua, Ms Stacey, Risk Communicator, South Carolina Department of Health and Environmental Control

Hamilton, MSgt Jonny, CAFB C-17 Technical Order Manager

Lawrence, Mr David, Chief of Remediation, Headquarters Aeronautical Systems Center.

May, Mr Warren, CAFB Engineering Design Supervisor

McMillan, MSgt Roger, CAFB Aircraft Maintenance Environmental Superintendent

Nelson, Capt Mike, C-17 System Program Office Environmental Officer.

Pape, Mr Henry, CAFB Hazardous Waste Program Manager

Powell, Mr David, CAFB Air Program Manager

Rowe, Mr Todd, McDonnell Douglas Logistics Representative to CAFB

Smith, Capt Maria, CAFB Hazardous Material Pharmacy Flight Chief

Wilson, Capt Rob, CAFB C-17 Facility Program Manager

Youngblood, Mr Don, CAFB Community Planner

C-17 Research Interview Worksheet

This interview contributes to a case study of the acquisition and beddown of the C-17 Globemaster III. Information about beddown experiences at Charleston AFB will be collected and analyzed as part of Capt Rich Houghton's graduate research at Air Force Institute of Technology. The research results will be reported in a thesis as part of the educational requirements for a master's degree. The key to this research is that the Air Force can learn some valuable lessons from the C-17 beddown. Information will be used to illustrate what actions we performed well, and what things we would do differently if we could.

Interviews will include seven standard questions and a flexible amount of follow up questions based on available time and level of experience of the interviewee. The following seven questions begin the interview:

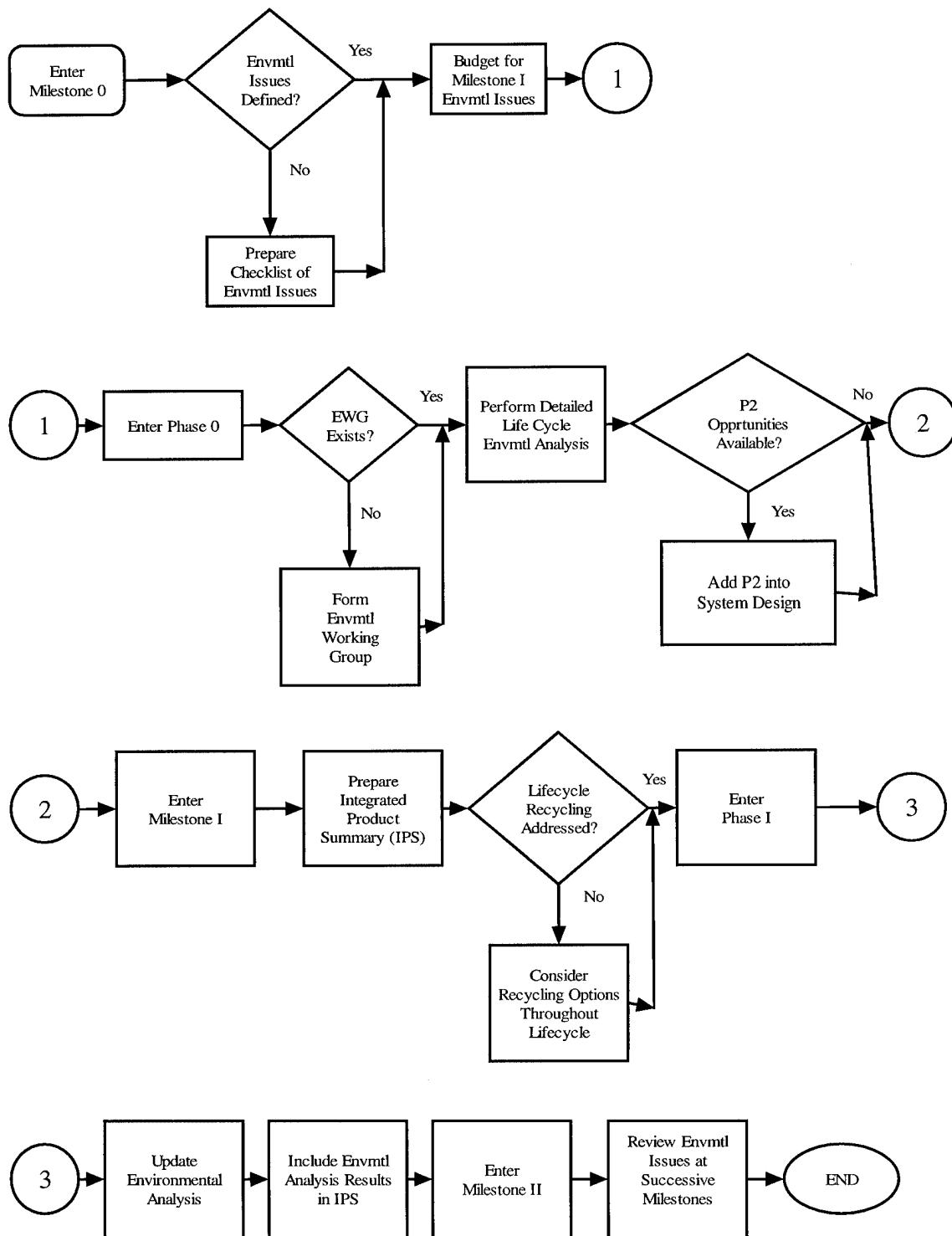
1. What is your duty title and AFSC?
2. How long have you been at Charleston AFB? (# Years and Months)
3. On a scale of 1-10, how would you characterize your knowledge of environmental laws and policies? (1 = low, 10 = high)
4. How would you rate the effect of the C-17 on your daily job? (1 = low, 10 = high)
5. To what extent have you needed information about the C-17 in order to perform your job? (1 = low, 10 = high)
6. When you needed information about the C-17, how timely was it? (1 = not , 10 = very)
7. Are there any people you recommend I interview to get further information?

Thank You.

Charleston AFB Interview Data - June 1995

NAME	# of MONTHS AT CAFB	SELF-ASSESSED ENVMTL SCORE	IMPACT OF C-17 ON JOB	NEED FOR C-17 INFO	TIMELINESS OF C-17 INFO
Capt Sandie Beneway	8	8	9	8	7
Mr Randy Bishop	17	5	8	2	10
Msgt Gregory Blair	168	3	8	9	10
Msgt Michael Braun	19	5	9	1	10
Ssgt Edgar Brewer	144	6	3	4	8
SMSgt Tom Clemons	241	2	5	3	10
Msgt Clayton Coffey	47	7	3	5	8
Mr Dale Cook	170	3	9	10	7
Lt Stacey Cummings	18	6	2	2	10
Mr Bill Dean	84	8	7	5	8
Mr Harold O. Deese	16	6	2	2	9
Mr Glenn Easterby	64	10	8	8	8
Mr Wayne Fanning	240	10	2	4	10
Capt Daryl Frazier	84	4	9	9	10
Ms Stacey Fuqua	3	7	1	1	10
Msgt Jonny Hamilton	41	4	10	10	10
Mr Warren May	120	5	9	9	2
Msgt Roger McMillan	69	7	8	8	9
Mr Henry Pape	17	8	8	8	10
Mr David Powell	16	8	4	8	9
Mr Todd Rowe	42	6	10	10	10
Capt Maria Smith	5	6	3	8	8
Capt Rob Wilson	19	4	9	10	7
Mr Don Youngblood	103	6	8	8	4

Appendix C: Flowchart of Acquisition Environmental Planning



Appendix D: C-17 Timeline

xx May 81 Air Force Systems Command (AFSC) produces **Environmental Assessment (EA)** for C-X Aircraft

xx Aug 81 USAF Chooses McDonnell Douglas (MD) C-17 to meet airlift needs

23 Jul 82 Limited low-level development Contract Award

02 Nov 87 Fabrication begins for first C-17

18 May 88 First F-117 engine delivered

xx Dec 88 Federal Aviation Administration Certifies F117-PW-100 engine

-- Jan 89 Defense Acquisition Board (DAB) makes milestone IIIA low rate Initial Production Decision

30 May 89 C-17 System Planning Office completes **supplemental programmatic EA** to update the May 1981 C-X environmental planning documentation

03 Aug 89 **Environmental Assessment** and FONSI for CAFB beddown completed

27 Nov 90 AFSC legal experts **reject idea of supplemental programmatic EA**

07 Mar 91 C-17 System Safety Office assigned new **environmental issues POC**

12 Aug 91 C-17 Environmental and Hazardous Material Control Working Group at Douglas Aircraft corporation, Long Beach CA, chaired by C-17 SPO

15 Sep 91 First C-17 Flight, Edwards AFB CA

-- Nov 91 First Maintenance Training Device at CAFB

13 Feb 92 C-17 **Environmental Working Group** meets at Long Beach CA

-Apr 92 First C-17 Flight Simulator at CAFB

07 May 92 C-17 **Environmental Working Group** meets at Long Beach CA

17 Aug 92 CAFB Environmental Office outlines C-17 Environmental Concerns for 437 AW/CC

14 Jun 93 First C-17 arrives at CAFB, tail number 891192 (Sixth Production C-17)

26 Aug 93 Second C-17 arrives at CAFB (Seventh Production Aircraft)

xx Dec 93 Fourth C-17 arrives at CAFB

30 Mar 94 DHEC issues **construction permit** for C-17 engine test facility

18 May 94 Seventh C-17 arrives at CAFB (Twelfth Production Aircraft)

30 Jun 94 Eighth C-17 arrives at CAFB

07 Jul 94 CAFB environmental office request investigation of C-17 fuel spills

18 Nov 94 Eleventh C-17 arrives at CAFB (Sixteenth Production Aircraft)

18 Feb 95 Thirteenth C-17 arrives at CAFB

20 Jun 95 Data Collection for Case Study at CAFB

28 Jun 95 CAFB Requests Permit Guidance for RM&AE from Mojave Desert Air Quality Management District

29 Jun 95 Mojave Desert Air Quality Management District grants approval to proceed with C-17 evaluation at Barstow-Dagget

05 Jul 95 USAF begins RM&AE at Barstow-Dagget Airfield

Appendix E: Statistical Analysis Results

One-Way Analysis Of Variance for Water by Year

SOURCE	DF	SS	MS	F	P
BETWEEN	3	4.114E+08	1.371E+08	2.84	0.0511
WITHIN	37	1.787E+09	4.830E+07		
TOTAL	40	2.198E+09			

		CHI-SQ DF	P
BARTLETT'S TEST OF EQUAL VARIANCES		2.82 3	0.4199

COCHRAN'S Q 0.3483
 LARGEST VAR / SMALLEST VAR 2.5547

COMPONENT OF VARIANCE FOR BETWEEN GROUPS 8.926E+06
 EFFECTIVE CELL SIZE 10.0

YEAR	SAMPLE	GROUP	
	MEAN	SIZE	STD DEV
-----	-----	-----	-----
92	2.092E+04	12	5005.8
93	2.756E+04	12	8000.9
94	2.746E+04	12	7823.4
95	2.914E+04	5	5788.8
TOTAL	2.578E+04	41	6949.8

TUKEY (HSD) PAIRWISE COMPARISONS OF MEANS OF WATER BY YEAR

YEAR	MEAN	HOMOGENEOUS
		GROUPS
-----	-----	-----
95	2.914E+04	I
93	2.756E+04	I
94	2.746E+04	I
92	2.092E+04	I

THERE ARE NO SIGNIFICANT PAIRWISE DIFFERENCES AMONG THE MEANS.

CRITICAL Q VALUE 3.805 REJECTION LEVEL 0.050
 STANDARD ERRORS AND CRITICAL VALUES OF DIFFERENCES
 VARY BETWEEN COMPARISONS BECAUSE OF UNEQUAL SAMPLE SIZES.

One-Way Analysis Of Variance for Sewage by Year

SOURCE	DF	SS	MS	F	P
BETWEEN	3	8.529E+08	2.843E+08	4.27	0.0110
WITHIN	37	2.464E+09	6.658E+07		
TOTAL	40	3.317E+09			

	CHI-SQ	DF	P
BARTLETT'S TEST OF EQUAL VARIANCES	0.45	3	0.9304

COCHRAN'S Q 0.3156
 LARGEST VAR / SMALLEST VAR 1.5012

COMPONENT OF VARIANCE FOR BETWEEN GROUPS 2.188E+07
 EFFECTIVE CELL SIZE 10.0

YEAR	SAMPLE MEAN	GROUP SIZE	STD DEV
92	3.653E+04	12	9032.6
93	2.502E+04	12	7493.9
94	2.976E+04	12	8151.9
95	3.381E+04	5	7372.0
TOT	3.085E+04	41	8159.9

TUKEY (HSD) PAIRWISE COMPARISONS OF MEANS OF SEWAGE BY YEAR

YEAR	HOMOGENEOUS MEAN	GROUPS
92	3.653E+04	I
95	3.381E+04	II
94	2.976E+04	II
93	2.502E+04	.. I

THERE ARE 2 GROUPS IN WHICH THE MEANS ARE
 NOT SIGNIFICANTLY DIFFERENT FROM ONE ANOTHER.

CRITICAL Q VALUE 3.805 REJECTION LEVEL 0.050
 STANDARD ERRORS AND CRITICAL VALUES OF DIFFERENCES
 VARY BETWEEN COMPARISONS BECAUSE OF UNEQUAL SAMPLE SIZES.

One-Way Analysis Of Variance for Energy Usage by Year

SOURCE	DF	SS	MS	F	P
BETWEEN	3	15.0945	5.03150	0.02	0.9955
WITHIN	44	10080.3	229.099		
TOTAL	47	10095.4			

CHI-SQ DF P
 BARTLETT'S TEST OF -----
 EQUAL VARIANCES 0.49 3 0.9204

COCHRAN'S Q 0.3076
 LARGEST VAR / SMALLEST VAR 1.5385

COMPONENT OF VARIANCE FOR BETWEEN GROUPS -18.6723
 EFFECTIVE CELL SIZE 12.0

FY	SAMPLE GROUP		
	MEAN	SIZE	STD DEV
91	30.385	12	13.535
92	30.057	12	16.788
93	30.992	12	14.983
94	29.440	12	15.062
TOTAL	30.218	48	15.136

TUKEY (HSD) PAIRWISE COMPARISONS OF MEANS OF TMBTU BY FY

FY	HOMOGENEOUS	
	MEAN	GROUPS
93	30.992	I
91	30.385	I
92	30.057	I
94	29.440	I

THERE ARE NO SIGNIFICANT PAIRWISE DIFFERENCES AMONG THE MEANS.

CRITICAL Q VALUE 3.776 REJECTION LEVEL 0.050
 CRITICAL VALUE FOR COMPARISON 16.501
 STANDARD ERROR FOR COMPARISON 6.1793

Bibliography

Aeronautical Systems Center. *Pollution Prevention in Weapon System Acquisition.* Wright Patterson AFB OH, 15 June 1994.

Aeronautical Systems Center. "C-17 Environmental and Hazardous Material Control (EHMC) Working Group (EWG) Charter," Wright Patterson AFB OH , 1991.

Air Force Materiel Command. *Acquisition Pollution Prevention AFMC Implementation Guide.* Volume I, Revision 1, Wright Patterson AFB OH, 30 December 1993.

Beneway, Sandra. Charleston AFB Deputy Chief of Environmental Management. Charleston AFB SC. Personal Interview. 28 June 1995.

Bush, Barbara L. Measuring Pollution Prevention Progress: How Do We Get There From Here?, *Pollution Prevention Review:* 431-443 (Autumn 1992).

Calliot, Patricia. Former HQ MAC Environmental Planner, Author of CAFB EA. Scott AFB IL. Telephone Interview. 12 October 1995.

Cheny, Dick. "Environmental Leadership." Memorandum for Defense Secretaries, The Pentagon, Washington, 19 August 1989.

Clark, Ray. "The National Environmental Policy Act and the Role of the President's Council on Environmental Quality", *The Environmental Professional*, 15: 4-6 (1993).

Code of Federal Regulations. 40 CFR Part 1508.28. Washington: GPO, 1995.

Comella, Paula A. and Robert W. Rittmeyer. "Waste Minimization/Pollution Prevention," *Pollution Engineering:* 71-74 (April, 1990).

Cook, Dale E. 437 AW/LG Quality Assurance Inspector. "Trip Report, Douglas Aircraft Corporation, 5-9 Aug 91." Memorandum for Record. Charleston AFB SC, 12 August 1991.

Culhane, Paul J. "Post-EIS Environmental Auditing: A First Step to Making Rational Environmental Assessment a Reality", *The Environmental Professional*, 15: 66-75 (1993).

Cummings, Stacey. Charleston AFB Environmental Officer. Charleston AFB SC. Personal Interview. 29 June 1995.

Department of the Air Force. *Charleston Air Force Base Commander's Summary*.
Charleston: 437 AW/PA, June, 1995.

Department of the Air Force. *Environmental Assessment: C-X Aircraft*. Wright Patterson
AFB: HQ AFSC, May 1981.

Department of the Air Force. *Environmental Assessment: Beddown of the C-17 at
Charleston Air Force Base*. Scott AFB: HQ MAC, 3 August, 1989.

Department of the Air Force. Environmental Impact Analysis Process. AFR 19-2.
Washington: HQ USAF, 10 August 1982

Department of Defense. *Environmental Consequence Analysis of Major Defense
Acquisition Programs*. Report No. 94-020. Arlington VA, 20 December, 1993.

Dickerson, William and Joseph Montgomery. "Substantive Scientific and Technical
Guidance for NEPA Analysis: Pitfalls in the Real World", *The Environmental
Professional*, 15: 7-11 (1993).

Easterby, Glen W. Charleston AFB Chief of Environmental Management. Charleston
AFB SC. Personal Correspondence and Interview. 26 June 1995.

Fanning, Wayne Assistant District Director, South Carolina Department of Health and
Environmental Control. Charleston SC. Personal Interview. 26 June 1995.

Freeman, Harry M. *Industrial Pollution Prevention Handbook*, New York: McGraw-
Hill, 1995.

Graham, James L. Jr. *The Impact of Environmental Regulation on Defense System
Acquisition Management*. Student Report. Defense Systems Management School,
Fort Belvoir VA, September 1976 (AD-A029335).

Habicht, Henry F. II. "EPA Definition of Pollution Prevention." EPA Memorandum,
28 May 1992.

Headquarters Air Force Systems Command. Correspondence: "Environmental
Assessment (EA) for C-17 Aircraft", Andrews AFB MD, 27 November 1990.

Jain, R.K. *Environmental Assessment*, New York: McGraw-Hill, 1993.

LPA Group Incorporated. *Charleston Air Force Base Joint Land Use Study*. Report
presented to Berkeley, Charleston and Dorchester Council of Governments.
December 1993.

Lawrence, David. Chief of Environmental Restoration, HQ ASC. Wright Patterson AFB OH. Personal Interview. 12 October 1995.

Lillie, Thomas H. and Harold E. Lindenhefen. "NEPA as a Tool for Reducing Risk to Programs and Program Managers," *Federal Facilities Environmental Journal*: 31-47 (Spring 1991).

May, Warren. Charleston AFB Civil Engineer Design Supervisor. Charleston AFB SC. Personal Interview. 26 June 1995.

Miller, Marshall C. and Elizabeth T. Williams. *Oversight of the C-17: A Case Study*. MS thesis, AFIT/GSM/LAA/93S-15. School of Systems and Logistics, Air Force Institute of Technology (AU), Wright-Patterson AFB OH, September 1993.

Murphy, Donald E. "Environmental Quality", Env 503, Field Perspectives in Environmental Management. School of Engineering, Air Force Institute of Technology (AU), Wright-Patterson AFB, OH (February 1995).

Nelson, Michael. C-17 Environmental Officer. Wright Patterson AFB OH. Personal Interview. 10 August 1995.

Noble, George P. III. "The Green Aspect of Acquisition Reform," *Program Manager*, 23: 29-32 (November-December 1994).

Office of Technology Assessment, U.S. Congress, "Green Products By Design", OTA-E-541, Washington DC: US Government Printing Office, October 1992.

Pape, Henry. Charleston AFB Environmental Engineer. Charleston AFB SC. Personal Interview. 27 June 1995.

Powell, David. Charleston AFB Air Program Manager. Charleston AFB SC. Personal Interview. 23 June 1995.

Price, Randy S. "Benchmarking Pollution Prevention: A Review of Best-In-Class Facility Programs," *Pollution Prevention Review*: 92-102 (Winter, 1993-94).

Przemieniecki, J. S. *Acquisition of Defense Systems*, Washington D.C.: American Institute of Aeronautics and Astronautics, Inc., 1993.

Ramphal, Shidrath. *Our Country, the Planet*, Washington DC: Island Press, 1992.

Schoonover, Joanne. *Accelerated Air Force Acquisition Processes*, Maxwell AFB Alabama: Air University Press, 1994.

South Carolina Department of Health and Environmental Control. Fuel Burning Permit.
“Aircraft Engine Test Facility Construction Permit”. Construction Permit Number
0560-0019-CI, Charleston AFB, 30 March 1994.

Yin, Robert K. *Case Study Research, Design and Methods*, Newbury Park: Sage
Publications, 1989.

Youngblood, Don. Charleston AFB Community Planner. Charleston AFB SC. Personal
Interview. 27 June 1995.

Vita

Captain Richard H. Houghton Jr. Was born on 2 October 1965 in Passaic, New Jersey. He graduated from Bergen Catholic High School and attended Stevens Institute of Technology, graduating with a Bachelor of Engineering Degree and a USAF commision in May, 1987. He served as a traffic engineer for the County of Los Angeles before entering active duty at the 60th Civil Engineering Squadron in January, 1988.

Captain Houghton was the Environmental Coordinator for Travis AFB from January 1988 through January 1992. He then became the Chief of Readiness for the 60th CES. From June - October 1992, Captain Houghton was assigned to the U.S. Army as Planning Officer, Deputy Chief of Staff, Engineer at Joint Task Force Bravo, Soto Cano Airbase, Honduras. From March - July 1993, he was assigned as Base Civil Engineer at Riyadh Air Base, Kingdom of Saudi Arabia.

After returning to Travis, he was chief of the 60 CES Airbase Operability Flight until attending Squadron Officer School in October 1993. From December 1993 - May 1994, Captain Houghton was the Chief of the 60 CES Operations Flight. He entered the Air Force Institute of Technology School of Engineering in May 1994. After graduation, he will serve as Chief of the Environmental Management Flight at Kunsan AB, Korea.

Permanent Address: 64 Madison Avenue

Rochelle Park, New Jersey 07662

REPORT DOCUMENTATION PAGE

*Form Approved
OMB No. 0704-0188*

Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302, and to the Office of Management and Budget, Paperwork Reduction Project (0704-0188), Washington, DC 20503.

1. AGENCY USE ONLY (Leave blank)			2. REPORT DATE	3. REPORT TYPE AND DATES COVERED	
			December 1995	Master's Thesis	
4. TITLE AND SUBTITLE			5. FUNDING NUMBERS		
A CASE STUDY OF THE ENVIRONMENTAL IMPACTS OF THE BEDDOWN OF THE C-17 GLOBEMASTER III AT CHARLESTON AFB					
6. AUTHOR(S)					
Richard H. Houghton Jr., Capt, USAF					
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES)			8. PERFORMING ORGANIZATION REPORT NUMBER		
Air Force Institute of Technology, WPAFB OH 45433-6583			AFIT/ENV/GEE/95D-07		
9. SPONSORING / MONITORING AGENCY NAME(S) AND ADDRESS(ES)			10. SPONSORING / MONITORING AGENCY REPORT NUMBER		
11. SUPPLEMENTARY NOTES					
12a. DISTRIBUTION / AVAILABILITY STATEMENT			12b. DISTRIBUTION CODE		
Approved for public release; distribution unlimited					
13. ABSTRACT (Maximum 200 words)					
<p>United States Air Force acquisition environmental planning has changed significantly since the passage of the National Environmental Policy Act in 1969. This research examined the role of environmental planning in weapon system acquisition. It focused on environmental planning performed for the C-17 Globemaster III prior to its beddown at Charleston Air Force Base. The case study of the C-17 beddown included interviews, archival record reviews, and direct observations at the base. Evidence was collected to determine what environmental impacts occurred during the beddown. An environmental postaudit compared actual impacts with those predicted in environmental planning documentation. Impacts were analyzed to determine if they resulted from local conditions or requirements. A framework of the acquisition process was constructed and environmental requirements were flowcharted. A timeline of C-17 events was developed for comparison of C-17 history with an ideal acquisition process. Finally, environmental planning documentation was evaluated using 20 objective criteria to determine its quality. Two minor impacts were identified at Charleston AFB during data collection in June 1995 - two years after the first C-17 arrived there. Impacts did not result from unique local conditions. Recommendations were presented regarding the quality and timing of weapon system environmental planning.</p>					
14. SUBJECT TERMS				15. NUMBER OF PAGES	
Environmental Planning, Weapon System Acquisition, Case Study, Postaudit, C-17, Beddown				105	
				16. PRICE CODE	
17. SECURITY CLASSIFICATION OF REPORT		18. SECURITY CLASSIFICATION OF THIS PAGE		19. SECURITY CLASSIFICATION OF ABSTRACT	
Unclassified		Unclassified		Unclassified	
20. LIMITATION OF ABSTRACT					
UL					

GENERAL INSTRUCTIONS FOR COMPLETING SF 298

The Report Documentation Page (RDP) is used in announcing and cataloging reports. It is important that this information be consistent with the rest of the report, particularly the cover and title page. Instructions for filling in each block of the form follow. It is important to **stay within the lines** to meet optical scanning requirements.

Block 1. Agency Use Only (Leave blank).

Block 2. Report Date. Full publication date including day, month, and year, if available (e.g. 1 Jan 88). Must cite at least the year.

Block 3. Type of Report and Dates Covered.

State whether report is interim, final, etc. If applicable, enter inclusive report dates (e.g. 10 Jun 87 - 30 Jun 88).

Block 4. Title and Subtitle. A title is taken from the part of the report that provides the most meaningful and complete information. When a report is prepared in more than one volume, repeat the primary title, add volume number, and include subtitle for the specific volume. On classified documents enter the title classification in parentheses.

Block 5. Funding Numbers. To include contract and grant numbers; may include program element number(s), project number(s), task number(s), and work unit number(s). Use the following labels:

C - Contract	PR - Project
G - Grant	TA - Task
PE - Program Element	WU - Work Unit
	Accession No.

Block 6. Author(s). Name(s) of person(s) responsible for writing the report, performing the research, or credited with the content of the report. If editor or compiler, this should follow the name(s).

Block 7. Performing Organization Name(s) and Address(es). Self-explanatory.

Block 8. Performing Organization Report Number. Enter the unique alphanumeric report number(s) assigned by the organization performing the report.

Block 9. Sponsoring/Monitoring Agency Name(s) and Address(es). Self-explanatory.

Block 10. Sponsoring/Monitoring Agency Report Number. (If known)

Block 11. Supplementary Notes. Enter information not included elsewhere such as: Prepared in cooperation with...; Trans. of...; To be published in.... When a report is revised, include a statement whether the new report supersedes or supplements the older report.

Block 12a. Distribution/Availability Statement.

Denotes public availability or limitations. Cite any availability to the public. Enter additional limitations or special markings in all capitals (e.g. NOFORN, REL, ITAR).

DOD - See DoDD 5230.24, "Distribution Statements on Technical Documents."

DOE - See authorities.

NASA - See Handbook NHB 2200.2.

NTIS - Leave blank.

Block 12b. Distribution Code.

DOD - Leave blank.

DOE - Enter DOE distribution categories from the Standard Distribution for Unclassified Scientific and Technical Reports.

NASA - Leave blank.

NTIS - Leave blank.

Block 13. Abstract. Include a brief (*Maximum 200 words*) factual summary of the most significant information contained in the report.

Block 14. Subject Terms. Keywords or phrases identifying major subjects in the report.

Block 15. Number of Pages. Enter the total number of pages.

Block 16. Price Code. Enter appropriate price code (*NTIS only*).

Blocks 17. - 19. Security Classifications. Self-explanatory. Enter U.S. Security Classification in accordance with U.S. Security Regulations (i.e., UNCLASSIFIED). If form contains classified information, stamp classification on the top and bottom of the page.

Block 20. Limitation of Abstract. This block must be completed to assign a limitation to the abstract. Enter either UL (unlimited) or SAR (same as report). An entry in this block is necessary if the abstract is to be limited. If blank, the abstract is assumed to be unlimited.